

**SUPPORTING STATEMENT  
FOR INFORMATION COLLECTION SUBMISSION 9000-0161  
Reporting of Purchases from Outside the United States**

**FAR Section(s) Affected: 52.225-18**

**A. Justification.**

**1. Administrative requirements.** This clearance covers the information that offerors must submit to comply with the Federal Acquisition Regulation (FAR) provision 52.225-18, Place of Manufacture. This provision requires offerors of manufactured end products to provide information as to whether the offered end products are predominantly manufactured in the United States or outside the United States.

**2. Uses of information.** Contracting officers use the information as the basis for entry into the Federal Procurement Data System (FPDS) for further data on the rationale for purchasing foreign manufactured items. The data is necessary for analysis of the application of the Buy American statute and the trade agreements.

**3. Consideration of information technology.** We use improved information technology to the maximum extent practicable. Where both the Government agency and contractors are capable of electronic interchange, the contractors may submit this information collection requirement electronically.

**4. Efforts to identify duplication.** These requirements are issued under the FAR which has been developed to standardize Federal procurement practices and eliminate unnecessary duplication.

**5. If the collection of information impacts small businesses or other entities, describe methods used to minimize burden.** The burden applied to small businesses is the minimum consistent with applicable laws, Executive orders, regulations, and prudent business practices.

**6. Describe consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently.** Collection of information on a basis other than solicitation-by-solicitation is not practical.

**7. Special circumstances for collection.** Collection is consistent with guidelines in 5 CFR 1320.6.

**8. Efforts to consult with persons outside the agency.**

A. A 60-day notice was published in the *Federal Register* at 84 FR 68455, on December 16, 2019. One comment was received; however, it did not change the estimate of the burden.

Comment: The commenter expressed support for the collection of data and stated that it should be maintained and enhanced given its essential role in informing policy decisions surrounding procurement and trade policy.

Response: This comment supports the collection of information as necessary for the proper performance of the functions of Federal Government acquisitions. It did not express an opinion on whether the stated number of burden hours is accurate for what they believe to be the actual number of hours an offeror expends to comply with the provision.

B. A 30-day notice was published in the *Federal Register* at 85 FR 11987, on February 28, 2020.

**9. Explanation of any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.** Not applicable.

**10. Describe assurance of confidentiality provided to respondents.** This information is disclosed only to the extent consistent with prudent business practices, current regulations, and statutory requirements.

**11. Additional justification for questions of a sensitive nature.** No sensitive questions are involved.

**12 & 13. Estimated total annual public hour and cost burden.**

Based on an FPDS report of Government-wide acquisition of manufactured end products in FY 2019, a total of 727,024 contracts were awarded.

Since this is a solicitation provision, we estimate an average of 4 responses per solicitation resulting in approximately 2,908,096 offers (727,024 x 4). FY 2019 FPDS data identified 30,740 unique vendors of manufactured end products. It is therefore estimated that approximately 30,740 respondents would need to comply with this information collection. The annual responses per respondent are a mathematical result of dividing the total annual responses by the 30,740 unique vendors (2,908,096/30,740=95). The time required to read and prepare information is estimated at .01 hour (less than one minute) per completion. Recordkeeping will be integrated into systems already established by offerors.

Estimated respondents/yr.....	30,740
Responses annually per respondent.....	x 95
Total annual responses.....	2,908,096
Estimated hrs/response.....	x .01
Estimated total burden hours.....	29,081
Hourly rate*.....	x \$55
Estimated cost to the public .....	\$ 1,599,455

\*Based on the OPM GS-12/step 5 salary (\$40.51 an hour) plus 36.25% fringe and overhead burden rate, the one mandated by OMB memorandum M-08-13 for use in public-private competition, rounded to the nearest dollar, or \$55 an hour. Reference Salary Table 2019-RUS, Effective January 2019, found at [www.opm.gov](http://www.opm.gov).

**14. Estimated Cost to the Government.** Agencies will review and input the information into FPDS with the award of covered contracts. The contracting officer only inputs data into FPDS for contracts awarded, not for each solicitation response.

Responses per year.....	2,908,096
Resultant contracts.....	727,024
Input into FPDS per response (hrs).....	x 0.01
Total Government burden hours.....	7,270
Hourly rate*.....	x \$55
Estimated cost to the Government.....	\$ 399,850

**15. Explain reasons for program changes or adjustments reported in Item 13 or 14.** The increase of responses from 1,483,592 to 2,908,096 and the associated increase in estimated burden hours from 14,836 to 29,081 is an adjustment due to use of the most current FPDS data available.

**16. Outline plans for published results of information collections.** Results will not be tabulated or published.

**17. Approval not to display expiration date.** Not applicable.

**18. Explanation of exception to certification statement.** Not applicable.

**B. Collections of Information Employing Statistical Methods.** Statistical methods are not used in this information collection.