

## SUPPORTING STATEMENT - PART A

Request for Approval for Qualification Training and Approval of Contractor Flight Crewmember; DD Form 2627, DD Form 2628, DD Form 3062; OMB Control Number 0704-0347

### Summary of Changes from Previously Approved Collection

- There has been an increase in respondents of DD Form 2627 and 2628 from 42 to 50 respondents.
- Respondent burden has increased to \$72,900.
- DD Form 3062 has been added to the collection to replace DCMA Form 644, but it is an identical in format. This has increased the public respondent burden by \$70,200. This has also increased cost to the Federal Government by \$18,096.

#### 1. Need for the Information Collection

This is a request for OMB approval of updated versions of previously approved forms (DD Form 2627 and 2628) for which approval has expired, and for OMB approval of new form (DD Form 3062), which replaces the Defense Contract Management Agency (DCMA) Form 644. The requirements to have government approval of contract flight crewmembers and contract flights is in Defense Contract Management Command Instruction (DCMA INST) 8210.1, Contractor's Ground and Flight Operations, Chapter 4. The contractor provides information on contractor personnel to the government. The government approves the contractor's request for aircrew training and eventually, approval for contractor personnel to operate and fly government aircraft. The government also approves all flights under contract.

#### 2. Use of the Information

The DD Form 2627 is used by contractors to request qualification training for contractor crewmembers. The contractor provides a personal history and verifies the crewmember's records and requests the government approve training in a particular type government aircraft. The 2627 and supporting documentation can be provided in hard or soft copy. Without the approval from the government, the contractor cannot use the personnel as requested. The information is used by Government Flight Representatives (GFRs) appointed in that role to perform Contract Administration Services (CAS) under FAR 42.302(a)(56) *Maintain surveillance of flight operations*. Once the GFR has approved the request he/she signs the form and returns it to the contractor's requesting official (CRO). The GFR maintains a copy for no longer than 3 years.

The DD Form 2628 is used by contractors to request aircrew qualification for contractor crewmembers. The contractor verifies the crewmember's training completion and

requests the government approve specific aircrew qualification in a particular type government aircraft. The 2628 and supporting documentation can be provided in hard or soft copy. Without the approval from the government, the contractor cannot use the personnel as requested. The information is used by Government Flight Representatives (GFRs) appointed in that role to perform Contract Administration Services (CAS) under FAR 42.302(a)(56) *Maintain surveillance of flight operations*. Once the GFR has approved the request he/she signs the form and returns it to the contractor's requesting official (CRO). The GFR maintains a copy for as long as the crewmember maintains his/her qualification or the contract ends.

The DD Form 3062 will replace the Agency form DCMA Form 644. The form is used by contractors to request approval of flights under contract. The 3062 can be provided in hard or soft copy. Without the approval from the government, the contractor cannot fly under the liability coverage provided by DFARS 252.228-7001, Ground and Flight Risk. The information is used by Government Flight Representatives (GFRs) appointed in that role to perform Contract Administration Services (CAS) under FAR 42.302(a)(56) *Maintain surveillance of flight operations*. Once the GFR has approved the request he/she signs the form and returns it to the contractor's requesting official (CRO). The GFR maintains a copy for 1 year.

3. Use of Information Technology

95% of forms are signed electronically. While contractors and GFRs have the option to use hard copies, the standard practice is to use only soft copies along with scanned supporting documents.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

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 DD Forms 2627 and 2628 are used once for new contractor crew-members and once for those upgrading to other aircraft or duties. The forms do not need to be re-accomplished unless the crew-member's qualification status will change, e.g., upgrading from mission pilot to instructor pilot, or obtaining qualifications in more than one aircraft.

The DD Form 3062 is used to approve single, daily, or weekly flights, and under certain conditions provided in DCMA INST 8210.1, Chapter 7, cover a time frame of up to one month.

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 for the collection published on Thursday, February 27, 2020. The 60-Day FRN citation is 85 FRN 11356.

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

A 30-Day Federal Register Notice for the collection published on Friday, May 29, 2020. The 30-Day FRN citation is 85 FRN 32367.

Part B: CONSULTATION

The forms were reviewed and approved by each of the U.S. Armed Services.

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 required for this collection. The PAS is included at the beginning of the form and follows:

**PRIVACY ACT STATEMENT AUTHORITY:** 10 U.S.C. 136; 10 U.S.C. 2302; DCMA INST 8210.1; and E.O. 9397.

**PRINCIPAL PURPOSE(S):** Used to monitor and manage individual contract flight/ground crew records.

**ROUTINE USE(S):** Data may be provided to the Federal Aviation Agency or other aviation authorities to carry out official functions. Data may also be provided under any of the blanket routine uses published by the Defense Components.

**DISCLOSURE:** Voluntary; however, failure to provide the information could result in disapproval of your request to participate in the program.

A draft copy of the SORN, PDCMA 1 DoD, has been provided with this package for OMB's review.

Copies of the DD Form 2627 are maintained in the system until the contractor's requesting official (CFO) rescinds the training request, in which case the forms will be destroyed; or

the crewmember completes flight training, at which time they will be destroyed and replaced with the DD Form 2628.

Copies of the DD Form 2628 are maintained for as long as the crewmember maintains his/her qualification or the contract ends.

Copies of the DD Form 3062 are maintained for 1 year.

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

a. Estimation of Respondent Burden

1) Collection Instrument(s)

[DD Form 2627]

- a) Number of Respondents: 50
- b) Number of Responses Per Respondent: 2
- c) Number of Total Annual Responses: 100
- d) Response Time: 30 minutes
- e) Respondent Burden Hours: 50 hours

[DD Form 2628]

- a) Number of Respondents: 50
- b) Number of Responses Per Respondent: 2
- c) Number of Total Annual Responses: 100
- d) Response Time: 30 minutes
- e) Respondent Burden Hours: 50 hours

[DD Form 3062]

- a) Number of Respondents: 100
- b) Number of Responses Per Respondent: 52
- c) Number of Total Annual Responses: 5200
- d) Response Time: 15 minutes
- e) Respondent Burden Hours: 1300 hours

2) Total Submission Burden

- a) Total Number of Respondents: 150
- b) Total Number of Annual Responses: 5400
- c) Total Respondent Burden Hours: 1400 hours

Part B: LABOR COST OF RESPONDENT BURDEN

1) Collection Instrument(s)

[DD Form 2627]

- a) Number of Total Annual Responses: 50

- b) Response Time: 30 minutes
- c) Respondent Hourly Wage: \$54
- d) Labor Burden per Response: \$27
- e) Total Labor Burden: \$1,350

[DD Form 2628]

- a) Number of Total Annual Responses: 50
- b) Response Time: 30 minutes
- c) Respondent Hourly Wage: \$54
- d) Labor Burden per Response: \$27
- e) Total Labor Burden: \$1,350

[DD Form 3062]

- a) Number of Total Annual Responses: 5,200
- b) Response Time: 15 minutes
- c) Respondent Hourly Wage: \$54
- d) Labor Burden per Response: \$13.50
- e) Total Labor Burden: \$70,200

2) Overall Labor Burden

- a) Total Number of Annual Responses: 5,400
- b) Total Labor Burden: \$72,900

The Respondent hourly wage was determined by using the average salary for a contracting flight crew member of \$112,320 per year.

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

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

1) Collection Instrument(s)

[DD Form 2627]

- a) Number of Total Annual Responses: 100
- b) Processing Time per Response: 1 hour
- c) Hourly Wage of Worker(s) Processing Responses: \$41.71
- d) Cost to Process Each Response: \$41.47
- e) Total Cost to Process Responses: \$4,171

[DD Form 2628]

- a) Number of Total Annual Response: 100
- b) Processing Time per Response: 1 hour
- c) Hourly Wage of Worker(s) Processing Responses: \$41.71

- d) Cost to Process Each Response: \$41.71
- e) Total Cost to Process Responses: \$4,171

[DD Form 3062]

- a) Number of Total Annual Responses: 5,200
- b) Processing Time per Response: 5 minutes
- c) Hourly Wage of Worker(s) Processing Responses: \$41.71
- d) Cost to Process Each Response: \$3.48
- e) Total Cost to Process Responses: \$18,096

- 2) Overall Labor Burden to the Federal Government
  - a) Total Number of Annual Responses: \$5,400
  - b) Total Labor Burden: \$26,438

The Respondent hourly wage was determined by using the Department of Defense's pay charts for 2017. They reflect the base pay for a Major/Lt Commander (O-4) with 12 years of service.

#### Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
  - a) Equipment: \$0
  - b) Printing: \$0
  - c) Postage: \$0
  - d) Software Purchases: \$0
  - e) Licensing Costs: \$0
  - f) Other: \$0
- 2) Total Operational and Maintenance Cost: \$0

#### Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$26,438
- 2) Total Operational and Maintenance Costs: \$0
- 3) Total Cost to the Federal Government: \$26,438

#### 15. Reasons for Change in Burden

For DD Forms 2627 and 2628 there have been no change in burden since the last approval.

DD Form 3062 is being added to the collection. This is replacing DCMA Form 644. The DCMA Form 644 is virtually identical to the DD Form 3062 except in the form number.

#### 16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

Yes, we are requesting approval to omit display of the OMB expiration date. The forms relate to contractual requirements regarding flight records. Maintaining consistent forms improves the stability of contractor operations. In the unintended case of expiration of the collection before re-approval, we do not wish to have respondent uncertainty regarding necessary completion of the form. The presence of an expiration date could lead to confusion in regards to correct completion of the form

18. Exceptions to “Certification for Paperwork Reduction Submissions”

We are not requesting an exemption to the provisions certified to in Item 19.a. of the OMB Form 83-I.