SUPPORTING STATEMENT

OMB Control Number 0704-0248

<u>Defense Federal Acquisition Regulation Supplement, Appendix F,</u> Inspection and Receiving Report

A. JUSTIFICATION

1. Need for the Information Collection

- a. This justification supports renewal of OMB Control Number 0704-0248. This information collection concerns Defense Federal Acquisition Regulation Supplement (DFARS) Appendix F, Material Inspection and Receiving Report.
- b. Appendix F contains procedures and instructions for submission of contractor payment requests and receiving reports using Wide Area WorkFlow (WAWF). 10 U.S.C. 2227(c) requires electronic submission and processing of claims for contract payments under DoD contracts but allows an exemption if electronic submission is unduly burdensome. DoD has designated WAWF as the platform for contractors to submit payment requests and supporting documentation, including receiving reports. WAWF supports the use, preparation, and distribution of the electronic equivalent for the DD Form 250, Material Inspection and Receiving Report, and the DD Form 250 series equivalents for property repairs and energy-related overland or waterborne shipments.

2. Use of the Information

Receiving reports showing Government acceptance or approval of contract deliverables are required to permit payment of contractor invoices. Federal Acquisition Regulation 32.905(c) requires that invoice payments are supported by a receiving report or other Government document to authorize the payment. The receiving report must include the contract number, date, description, quantities of supplies received or services performed, as well as identification of the designated Government official who accepted the supplies or services.

3. <u>Use of Information Technology</u>

Information technology is used approximately 100 percent of the time to collect the information. Contractors submit payment requests and receiving reports to WAWF via Electronic Data Interchange, Secure File Transfer Protocol, or via direct input through the WAWF website.

In accordance with DFARS clause 252.232-7003, Electronic Submission of Payment Requests and Receiving Reports, Contractors are required to submit electronic payment requests and receiving reports in WAWF in nearly all cases. In addition, when contractors utilize WAWF in accordance with DFARS 252.232-7003 and Appendix F, the item unique identification (IUID) information required by DFARS clause 252.211-7003 is automatically transmitted to the IUID Registry.

4. Non-duplication

As a matter of policy, DoD reviews the DFARS to determine whether adequate language already exists. This information collection does not duplicate any other requirement.

5. Burden on Small Business

This collection is not expected to impose a significant burden on small businesses, because the use of electronic tools facilitates timely and accurate payments, which can improve cash-flow management and reduce operating costs. Manual, i.e., non-electronic, practices and processes involving paper invoices and receiving reports can result in redundant data entry, misplaced documents, higher than necessary transaction processing fees, and payment delays. Considering that WAWF is available to all DoD contractors at no cost and facilitates timely and accurate payments, most small businesses are expected to prefer WAWF over other methods. With few exceptions, the processing of payment requests and receiving reports through WAWF is only limited by access to the internet, which is rare in today's commercial marketplace.

6. <u>Less Frequent Collection</u>

Contractor payment requests are submitted in accordance with each individual contract's terms and conditions, and receiving reports are completed to document receipt of the goods or services being invoiced. Less frequent collection could result in violation of a contract's terms and hinder timely and accurate payments to contractors.

7. Paperwork Reduction Act Guidelines

There are no special circumstances for collection. Collection of this information is consistent with the guidelines at 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

- a. This information collection is consistent with the guidelines in 5 CFR 1320.6. DoD solicited public comments in the *Federal Register* on September 11, 2020, at <u>85 FR 56222</u>. No comments were received in response to this notice.
- b. Subject matter experts within DoD were consulted regarding the renewal of this information collection.
- c. DoD published a notice of submission to OMB for clearance of this information collection in the *Federal Register* on November 20, 2020 at <u>85 FR 74323</u>.

9. Gifts or Payment

DoD will not provide a payment or gift to respondents under this information collection requirement.

10. Confidentiality

This information is disclosed only to the extent consistent with statutory requirements, current regulations, and prudent business practices. The collection of information does not include any personally identifiable information; therefore, no Privacy Impact Assessment or Privacy Act System of Records Notice is required.

11. Sensitive Questions

No sensitive questions are involved.

12. Respondent Burden and its Labor Costs

According to fiscal year (FY) 2019 data available in WAWF, there were approximately 335,750 individual contractor personnel using WAWF. These users represent 148,885 unique entities (companies), and they processed approximately 2.9 million receiving reports during FY 2019.

Prior inquiries with contractors that use the WAWF electronic receiving reports extensively have indicated that it takes no more than one minute to prepare the forms electronically. This reduced timeframe is because many WAWF receiving report data elements are prepopulated from either the contract or a previously submitted receiving report. As a conservative approximation, an estimate of three minutes per report (.05/hour) is used to accommodate time to upload any required documentation/attachments and to account for the very few manual (paper) DD Form 250 reports that may be processed outside of the WAWF system.

Estimation of Respondent Burden: DFARS Appendix F		
Number of respondents	148,885	
Responses per respondent	~19.5	
Number of responses	2,900,000	
Hours per response (3 minutes)	.05	
Estimated hours	145,000	
Cost per hour (hourly wage)(See Note)	\$39	
Cost per Response	\$1.95	
Annual public burden	\$5,655,000	

Note for labor rate calculation: Cost per hour is \$39, based on OPM GS-09, step 5, base hourly rate for 2020 (\$28.73) plus the 36.25% civilian personnel full fringe benefit rate from OMB Memo M-08-13, rounded to the nearest dollar (\$39). The OPM rate used includes locality pay area for the rest of the U.S.

13. Respondent Costs Other Than Burden Hour Costs

DoD does not estimate any annual cost burden apart from the hourly burden in Item 12 above.

14. Cost to the Government

The estimate of the time it will take the Government representative to review and analyze the each response is three minutes. The estimated cost to the Government is shown in the following table:

Estimation of Government Burden: Appendix F		
Number of responses (receiving reports)	2,900,000	
Number of hours (3 minutes)	.05	
Burden Hours	145,000	
Cost per hour (See Note)	\$39	
Cost to the Government	\$5,655,000	

Note for Labor rate calculation: Cost per hour is \$39, based on OPM GS-09, step 5, base hourly rate for 2020 (\$28.73) plus the 36.25% civilian personnel full fringe benefit rate from OMB Memo M-08-13, rounded to the nearest dollar (\$39). The OPM rate includes locality pay area for the rest of the U.S.

15. Reasons for Change in Burden.

The change in burden estimation is shown in the following table:

Change in Burden	2017	2020	Difference
Number of respondents	153,000	148,885	-4,115
Responses/respondent	18	19	+1
Total annual responses	2,800,000	2,900,000	+100,000
Hours per response	3 minutes	3 minutes	0
Total Hours	140,000	145,000	+5,000
Cost per hour	\$37.00	\$39.00	+2.00
Total Cost	\$5,180,000	\$5,655,000	+\$475,000

Reasons for change in burden: The changes in burden were relatively insignificant, and the data indicates stability, most likely attributed to familiarity with WAWF capabilities.

The overall increase in burden is approximately 9% which is the result of an approximately 3.5% increase in the number of responses combined with the increased cost for labor.

16. Publication of Results

Results of this information will not be tabulated or published.

17. Expiration Date

DoD requests that the previously granted approval to not display the expiration date, as provided for in 5 CFR 1320.5(a)(1)(iii)(C) and 1320.8(b)(1), be continued for this collection. The DD Form 250 series first obtained OMB clearance under the Paperwork Reduction Act under DAR Case 1979-89. The OMB clearance number was affixed to the form at that time, and permission was granted to not display the expiration date, since an inordinate expense would have been incurred in the reprinting and restocking of the form every 3 years when the expiration date was revised. Currently, the preponderance of the use of the DD Form 250 series is electronic, as the forms are programed into the WAWF system and interface with several other Government financial and logistical systems, and has thousands of contractor and Government users. The cost of reprogramming the WAWF database every 3 years to revise the expiration date of the OMB clearance for the electronic DD 250 series is an expense that can be avoided by continuing the approval to not display the OMB clearance expiration date.

18. Exceptions to Certification for Paperwork Reduction Submissions

There are no exceptions to the certification accompanying this Paperwork Reduction Act submission.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods will not be employed.