

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION
3090-0163, INFORMATION SPECIFIC TO A CONTRACT OR
CONTRACTING ACTION (NOT REQUIRED BY REGULATION)**

A. Justification

1. Explain the circumstances that make the collection of information necessary.

The General Services Administration (GSA) has various mission responsibilities related to the acquisition and provision of supplies, transportation, information technology, telecommunications, real property management, and disposal of real and personal property. These mission responsibilities generate requirements that are realized through the solicitation and award of public contracts.

Most GSA procurement-related information collections are required by the Federal Acquisition Regulation (FAR) or General Services Administration Acquisition Regulation (GSAR); each clause requiring such a collection must be individually approved by the Office of Management and Budget (OMB). However, some solicitations require contractors to submit information specific to that contracting action, such as information needed to evaluate offers (e.g. specific instructions for technical and price proposals, references for past performance) or data used to administer resulting contracts (e.g. project management plans).

This information collection is associated with GSA's requirements for additional details under solicitations issued in accordance with the Uniform Contract Format per FAR Part 14, Sealed Bidding (see GSAR 514.201-1); FAR Part 15, Contracting by Negotiation (see GSAR 552.215-73); and solicitations under FAR Part 12, Acquisition of Commercial Items (see GSAR 512.301). This includes information collection requirements found in GSA Federal Supply Schedule (FSS) solicitations.

2. Indicate how, by whom, and for what purpose the information is to be used.

Contracting officers use the information to evaluate offers and administer resulting contracts. Such information is also necessary for program managers to make informed decisions germane to those specialized areas.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques.

GSA uses improved information technology to the maximum extent practicable. Where both the GSA and contractors are capable of electronic interchange, the contractors may submit information requirements electronically.

4. Describe efforts to identify duplication.

As indicated in Item 1 above, the requirements are not mandated by regulation and usually are germane to a particular solicitation or resulting contract(s).

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

Burdens usually apply equally to large and small businesses that want to contract with GSA. Burden is kept to the minimum necessary to meet the specific objectives of a solicitation or contract.

6. 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.

Offers could not be properly evaluated, specific program objectives would not be met, or performance could not be measured.

7. Explain any special circumstances.

Upon occasion due to urgency of a procurement or when conducting an acquisition of commercial items, respondents may be requested to prepare a written response to a collection of information (response to solicitation for offers) in fewer than 30 days after receipt of the request. Respondents may also be required by contract to submit information more often than quarterly (e.g. monthly). An example of a monthly reporting requirement is a project progress plan.

8. Describe efforts to consult with persons outside the agency.

A 60-day notice was published in the *Federal Register* at 85 FR 62731 on October 5, 2020. Two comments were received. No changes were made to the information collection requirements or supporting statement as a result of the public comments, because they were not applicable to the policy.

A 30-day notice published in the *Federal Register* at 85 FR 83583 on December 22, 2020.

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

GSA makes no such payments under this collection.

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

Confidentiality will be provided to contractors in accordance with prudent business practices and current regulations.

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

No sensitive questions are involved.

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

Total public reporting burden for this collection of information includes the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

The estimated number of respondents annually is 2,597,377, with one response per respondent. Each response requires 0.40 hours (20 minutes). Time estimates are based on professional judgment. The number of respondents is based on data from the Federal Procurement Data System (FPDS) for Fiscal Year (FY) 2020, which shows GSA made approximately 27,878 new awards with 2,594,599 offers received. Additionally, the Federal Acquisition Service, Office of Acquisition Management, determined there were 2,778 offers received and 1,320 new awards for Federal Supply Schedule (FSS) contracts. FSS offers are coded uniquely in FPDS because those contracts have standing solicitations, so they were not included in the 2,594,599 figure.

Estimated respondents per year	2,597,377
Estimated responses per respondent	<u>x 1</u>
Total annual responses	2,597,377
Estimated hours per response	<u>x 0.40</u>
Total Response Burden Hours	1,038,950

Cost per hour*	<u>x \$46.88</u>
Estimated Cost Burden to the Public	\$48,705,976

*The estimated cost of \$46.88 per hour is based on the task being accomplished by senior level contractor personnel equivalent to a GS-12, Step 5 salary (Base Pay and Rest of US Locality Pay) (Salary Table 2020-GS, Effective January 2020), with fringe of 36.25% (OMB Memo M-08-13).

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

Not applicable. See response to Item 12, above.

14. Provide estimates of annualized costs to the Federal Government.

The total number of responses is estimated to be 2,597,377 each year. Reviewing and processing each response should take approximately 0.25 hours (15 minutes).

Responses per year	2,597,377
Reviewing time per response	<u>x 0.25</u>
Total Review Burden Hours	649,344

Cost per hour*	<u>x \$46.88</u>
Total Government Cost	\$30,441,246

*The estimated cost of \$46.88 per hour is based on the task being accomplished by senior level contractor personnel equivalent to a GS-12, Step 5 salary (Base Pay and Rest of US Locality Pay) (Salary Table 2020-GS, Effective January 2020), with fringe of 36.25% (OMB Memo M-08-13).

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

The total cost burden to the public increased from \$3,758,005 (2017 estimate) to \$30,441,246

(2020 estimate). The following is a comparison of the total cost burden elements from 2017 to 2020 to explain the differences:

- Response Time: This figure, 0.40 hours, is unchanged from 2017.
- Responses per year: This figure increased from 347,239 responses to 2,597,377 responses, based on information obtained from the Federal Acquisition Service and the Federal Procurement Data System (FPDS) for Fiscal Year 2020. This data includes all awards over the micropurchase threshold. The data pulled for 2017 was not fully accurate as it did not include orders.
- Cost per hour: The current rate, \$46.88/hour, is an increase over the previous rate of \$43.29/hour, based on the latest GS Federal Salary Table.

16. For collections of information whose results will be published, outline plans for tabulation and publication.

Results will not be tabulated or published. Data collected will be used for internal administration of contracts.

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.

GSA is not seeking such approval for this collection.

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

GSA has no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

Statistical methods are not used in this information collection.