

SUPPORTING STATEMENT – PART A

Certification of Qualified Products – OMB Control Number 0704-0487

Summary of Changes from Previously Approved Collection

- *Increase in burden due to an increase in pending certifications and a small increase in hourly wages for both respondents and workers processing responses.*
- *Very minor changes to DD Form 1718*

1. Need for the Information Collection

Per 10 U.S.C. 2319 and subpart 9.2 of the Federal Acquisition Regulation (FAR), as well as DoDM 4120.24, Qualification is the responsibility of the Preparing Activity for the specification. The purpose of Qualification is to ensure continued product performance, quality, and reliability, as well as provide for the completion of long or highly complex evaluations and tests prior to and independent of an acquisition or contract. As evidence that the products or processes and materials meet the specifications requirements, it is stated in policy that a self-certification must be done every two years by the manufacturer/distributor. Within the Qualification Program, the manufacturer must:

- Maintain adequate process and quality control procedures to ensure that the items continually comply with all specification requirements
- Report immediately any discrepancies from testing, periodic product reexaminations, and production process and controls.
- Ensure that delivered items conform to all requirements including performance, quality, reliability, and all other specification product characteristics.
- Ensure that all products are manufactured and tested in a manner that was approved under the original specification. This includes the manufacturing process and plant locations, test sequences, test methods, and test procedures used.

It is for these reasons that the DoDM 4120.24 calls for the use of DD Form 1718 by manufacturers to retain Qualification.

2. Use of the Information

The DD 1718 Form “Certification of Qualified Products” is the form associated with this information collection. The DD Form 1718 is sent to the manufacturer every two years by the Qualifying Activity when the applicable specification does not contain complete requalification testing, and requests the manufacturer to complete the form. The manufacturer’s products will be removed from the Qualified Products List (QPL) or the Qualified Manufacturers List (QML) if the certification is not returned after due notice. The manufacturers complete the form by certifying that their products still meet the specification requirements as originally tested. The manufacturers then return the form to the Qualifying Activity via mail, email, or fax. The Qualifying Activity reviews the forms, validates the information, and updates the QPL/QML information so that the supplier is

revalidated and remains active on the listing for another two years. This allows the government to continue purchasing the manufacturer's listed products. The form requests such information as:

- Is the listed product still manufactured at the plant shown on the QPL/QML?
- Is the plant still under the same management?
- Are the products still manufactured under the same conditions as originally qualified, with the same process, materials, construction, design, and manufacturer's part number or designation?
- Does the product meet the requirements and tests of the latest issue of the specification?

3. Use of Information Technology

In 2006, the Defense Standardization Program Office (DSPO) in conjunction with the Qualifying Activities automated the Qualification Program, thus providing Qualification data in near real time. The form is sent via email to manufacturers and all of the responses to the DD Form 1718 are returned electronically. While most vendors have the ability to sign the form digitally, manufacturers can also print, sign and scan the form and still return via email.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source. The military services or Defense Agencies do not have any forms or information collections that duplicate the information collected. Our office maintains the sole responsibility to collect this information.

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 information is collected in 24 month cycles. If collections were stopped, the ability of the Department of Defense to ensure these qualified products meet the specified requirement would be compromised, as these products are not tested after initial qualification. Certification via the use of DD Form 1718 ensures that the DoD has legal recourse should any of these products experience failures that might affect DoD's mission.

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 (FRN) for the collection published on Thursday, March 18, 2021. The 60-Day FRN citation is 86 FR 14737.

1 comment was received during the 60-Day Comment Period. However, the comment was found to be unrelated to this information collection.

A 30-Day Federal Register Notice for the collection published on Thursday, July 1, 2021. The 30-Day FRN citation is 86 FR 35078.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the Federal Register was conducted for this submission.

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 not required for this collection because we are not requesting individuals to furnish personal information for a system of records.

A System of Record Notice (SORN) is not required for this collection because records are not retrievable by PII.

Privacy Impact Assessment (PIA) is not required for this collection because PII is not being collected electronically.

Records associated with this collection are designated 4155.20 Specification Files in the August 2018 DLA Records Schedule. They are destroyed/deleted 1 year after specification is revised or cancelled.

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

1) Collection Instrument(s)

Certification of Qualified Products (DD Form 1718)

- a) Number of Respondents: 1320
- b) Number of Responses Per Respondent: 1
- c) Number of Total Annual Responses: 1320
- d) Response Time: 30 minutes
- e) Respondent Burden Hours: 660 hours

2) Total Submission Burden

- a) Total Number of Respondents: 1320
- b) Total Number of Annual Responses: 1320
- c) Total Respondent Burden Hours: 660 hours

Part B: LABOR COST OF RESPONDENT BURDEN

- 1) Collection Instrument(s)
Certification of Qualified Products (DD Form 1718)
 - a) Number of Total Annual Responses: 1320
 - b) Response Time: 30 minutes
 - c) Respondent Hourly Wage: \$28.91
 - d) Labor Burden per Response: \$14.46
 - e) Total Labor Burden: \$19,080.60

- 2) Overall Labor Burden
 - a) Total Number of Annual Responses: 1320
 - b) Total Labor Burden: \$19,081

The Respondent hourly wage was determined by using the Department of Labor Wage Website at https://www.bls.gov/oes/current/oes_nat.html.

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)
Certification of Qualified Products (DD Form 1718)
 - a) Number of Total Annual Responses: 1320
 - b) Processing Time per Response: 30 minutes
 - c) Hourly Wage of Worker(s) Processing Responses: \$41.78
 - d) Cost to Process Each Response: \$20.89
 - e) Total Cost to Process Responses: \$27,574.80

- 2) Overall Labor Burden to the Federal Government
 - a) Total Number of Annual Responses: 1320
 - b) Total Labor Burden: \$27,574.80

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: \$0.00

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$27,574.80
- 2) Total Operational and Maintenance Costs: \$0
- 3) Total Cost to the Federal Government: \$27,575

15. Reasons for Change in Burden

The burden has increased slightly since the previous approval due to the fact that there are more products requiring certification retention than when we last applied for approval. This number fluctuates depending on when a manufacturer was first granted qualification. The estimated hourly wage for respondents and workers processing responses has also increased slightly.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.