

NASA Property in the Custodian of Contractors

KBR (MSOC & IMOC) RESPONSE

KBR (MSOC & IMOC) has comments on the proposed update to annual NF1018 reporting requirement.

Comments are:

1) Whether the proposed collection of information is necessary for the proper performance of the functions of NASA, including whether the information collected has practical utility;

We do not believe that the additional form is necessary or practical to the Public (Business or other for-profit and not-for-profit institutions), therefore, the determination of necessity and practical utility lies with the Government.

When making the determination of necessity or practicality, the Government should consider the value of external reviews such as our Annual PMSAs which verify FAR and NFS compliance and identify potential Risks to the government's assets. This form would only duplicate those efforts and may in fact be contrary to the observations made by the Government's own Property Administration.

NASA HQ Response: The objective of the proposed collection of information is critical to the government because the purpose is to ascertain the ability of the awardees property management system to protect, preserve, account for, and control government-owned property in their custody. The proposed collection of information included various tests and analyses of the awardees internal management controls for property management, inventory procedures, reports, disposition activities and other areas as deemed necessary to perform the analysis. The information is currently being requested and answered by NASA awardees since NASA been managing awards without a formal NASA Form (NF). This NF answers the errors being received on the annual NF1018 in Section 20 (a and b); now the NASA awardees are no longer missing data and errors from their annual property submissions.

2) the accuracy of NASA's estimate of the burden (including hours and cost) of the proposed collection of information;

"Estimated Time Per Response: 1.5 hours"

Although the completion of the actual form takes approximately 1-2 hours, KBR (MSOC & IMOC) currently on a monthly basis 8-10 hours per month updating our tracking records and an additional 100-120 hours to fully compile all of the information into the appropriate "buckets" required to complete the annual NF1018.

When the NF1019 is required, it will also take an "estimated" 1-2 hours for the form completion, but the hours required to collect the data for the form will be an additional burden on MSOC & IMOC. Our assumption would be that this would be an equal or greater preparation time.

The estimated time that the government is proposing grossly underestimates the time required to prepare these reports if the estimate only includes the time to enter the data into the system.

3) ways to enhance the quality, utility, and clarity of the information to be collected; and

The data elements for the NF1019 are directly related to the results of the annual PMSA (Property Management System Audit) performed by the NASA GPA/DCMA. It seems to me that the government

could look at using the annual PMSA to accomplish what the need. This form appears to only be an additional burden on the contractors that are already being audited by the government for the same thing.

NASA HQ Response: The NF1019 is a PMSA currently conducted by NASA Industrial Property Officers (IPOs) and Property Administrators (PAs) on NASA awards without the NF. According to NASA's Contract Property Program risk matrix, the same information is currently being requested and answered by NASA awardees since NASA been managing awards without a formal NASA Form (NF). This NF answers the errors being received on the annual NF1018 in Section 20 (a and b); now the NASA awardees are no longer missing data from their annual property submissions. The proposed collection of information is considered to be part of the NASA awardees' overall management systems and, as such, the cost of reporting the proposed collection of information is included in the overhead or as General Administrative expenses charged indirectly to NASA awards.

4) ways to minimize the burden of the collection of information on respondents, including automated collection techniques or the use of other forms of information technology.

It would seem to make more sense to have the information recorded during the government's PMSA process be the source of this information since it is coming from a NASA expert source external to the contractor's own assessment. Would it be possible to have the form automatically import the data from the NASA/DCMA PMSA results and therefore remove the additional burden from the contractors?

NASA HQ Response: The automatic import feature is something that would be looked into in the future. According to NASA's Contract Property Program risk matrix, the same information is currently being requested and answered by NASA awardees since NASA been managing awards without a formal NASA Form (NF). The proposed collection of information is considered to be part of the NASA awardees' overall management systems and, as such, the cost of reporting the proposed collection of information is included in the overhead or as General Administrative expenses charged indirectly to NASA awards. The NF1019 is a PMSA currently conducted by NASA Industrial Property Officers (IPOs) and Property Administrators (PAs) with NF. The NF1019 is a uniformed NF for all NASA Space Centers send to all NASA awardees.

NATIONAL AERONAUTICS AND SPACE ADMINISTRATION [NOTICE: (21-045)] Name of Information Collection: NASA Property in the Custodian of Contractors AGENCY: National Aeronautics and Space Administration (NASA). ACTION: Notice of information collection. SUMMARY: The National Aeronautics and Space Administration, as part of its continuing effort to reduce paperwork and respondent burden, invites the general public and other Federal agencies to take this opportunity to comment on proposed and/or continuing information collections. DATES: Comments are due by [INSERT DATE 60 DAYS AFTER DATE OF PUBLICATION IN THE FEDERAL REGISTER]. ADDRESSES: Written comments and recommendations for this information collection should be sent within 60 days of publication of this notice to www.reginfo.gov/public/do/PRAMain. Find this information collection by selecting "Currently under 60-day Review-Open for Public Comments" or by using the search function. FOR FURTHER INFORMATION CONTACT: Requests for additional information or copies of the information collection instrument(s) and instructions should be directed to Claire Little, NASA Clearance Officer, NASA Headquarters, 300 E Street SW, JF0000, Washington, DC 20546, 202-358-2375 or email claire.a.little@nasa.gov.

This document is scheduled to be published in the Federal Register on 07/26/2021 and available online at federalregister.gov/d/2021-15828, and on govinfo.gov SUPPLEMENTARY INFORMATION: I.

Abstract: To ensure accurate reporting of Government-owned, contractor-held property on the financial statements and to provide information necessary for effective property management in accordance with FAR Part 45, NASA obtains summary data annually from the official Government property records maintained by its contractors. The information is submitted via the NASA Form 1018, at the end of each fiscal year.

Additional information submitted to approve the accuracy of the contractor property management system compliance is submitted via NASA Form 1019, at the beginning of awards with NASA property in the hands of contractors; and same information gathered by Federal agencies assisting NASA according to risk matrix. Information for property management system in accordance with FAR Part 45, NASA is the agency responsible for contract administration shall conduct an analysis of the contractor's property management policies, procedures, practices, and systems. II. Methods of Collection: Electronic. III. Data Title: NASA Property in the Custody of Contractors OMB Number: 2700-0017 Type of review: Renewal of a previously approved information collection.

Affected Public: Business or other for-profit and not-for-profit institutions

Estimated Annual Number of Activities: 1200

Estimated Number of Respondents per Activity: 1

Annual Responses: 1200

Estimated Time Per Response: 1.5 hours

Estimated Total Annual Burden Hours: 1800

Estimated Total Annual Cost: \$36,000

IV. Request for Comments

Comments are invited on: 1) Whether the proposed collection of information is necessary for the proper performance of the functions of NASA, including whether the information collected has practical utility; 2) the accuracy of NASA's estimate of the burden (including hours and cost) of the proposed collection of information; 3) ways to enhance the quality, utility, and clarity of the information to be collected; and 4) ways to minimize the burden of the collection of information on respondents, including automated collection techniques or the use of other forms of information technology. Comments submitted in response to this notice will be summarized and included in the request for OMB approval of this information collection. They will also become a matter of public record. Lori Parker, NASA PRA Clearance Officer. [FR Doc. 2021-15828 Filed: 7/23/2021 8:45 am; Publication Date: 7/26/2021