

August 31, 2021

NASA Property in the Custodian of Contractors

Review of Notice 21-045

NASA Stated Purpose of Requested Review: Reduction in paperwork and respondent burden associated with information collection.

NASA requested comments on the following:

1. Whether the proposed collection of information is necessary for the property 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.
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.

Reply:

1. *Whether the proposed collection of information is necessary for the property performance of the functions of NASA, including whether the information collected has practical utility.*
 - a. Yes, the proposed (perhaps more accurately stated as "the continued") collection of information related to the NASA property accountable to NASA contracts is necessary for the performance of the functions of NASA, especially considering no other alternative data collection process is being proposed by NASA. In addition, the information collected has practical utility.
 - i. It is a long established and accepted principle that Government departments and agencies must know the quantity of and dollar value of all property associated with their entity,

including Government property accountable to contracts. The detailed reasons for the need for such data are well established by various models of business practices and the history of those practices, and in business articles and literature.

- ii. The collection of the data in discussion is necessary in order to ensure the accuracy of NASA's reporting of accountable property in their financial statement.

NASA HQ Response: The NF1018 is a NASA award requirement for the property in the hands of NASA awardees. This activity should be accomplished all year round as the property is received, stored, consumed, and excessed, etc. The prime awardees are required to flow down the government requirements to their additional awardees working under their prime NASA awards. Awardees and anyone working under their awards should never wait until the last minute to accomplish these tasks.

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

- a. NASA's estimate on the time per response of 1.5 hours (per NASA Form 1018) and total annual burden hours of 1800 hours (to arrive at the final 1018 product for submittal to NASA) and corresponding total annual cost of \$36,000, is highly inaccurate.

- i. Based upon my personal experience having been the contractor individual responsible for the submittal of the 1018's for the NAS9-17540 (Boeing Shuttle Flight Equipment Processing Contract) and NAS9-20000 (United Space Alliance Space Shuttle Transportation Contract), I can attest to the hundreds of hours necessary to arrive at the final submitted Form 1018 to NASA.

1. Considering the time involved for the prime contractors and for the hundreds of subcontractors and lower tier subcontractors necessary to arrive at their data to submit up the chain to the prime contractor, 1.5 hours

per response is completely inaccurate. The process to create an accurate 1018 is extremely labor intensive. Contractors must validate/reconcile inventory listings extracted from their property management databases as of September 30 with the Balance End of Period (column "d") value which is mathematically derived on the 1018. Based upon my experience simply submitting the 1018 as a prime contractor, I spent many nights at the office the day before the 1018 was due attempting to gather the necessary data and reconciling the data to ensure the accuracy of our report. (In spite of good intentions, actual submittal of the report was always on the last day before the required due date.)

2. In addition to the actual time necessary to prepare the actual 1018 form for submittal to NASA, sub and prime contractors spend a multitude of hours (1) validating the actual data reflected in their 1018 submittal, (2) collecting and validating backup documentation to support their data submittal, (3) training on how to complete the 1018 report, (4) training in individual computer systems established to collect the raw data, and (5) in discussions with their NASA Government Property Administrator concerning their 1018 prior to submittal of the form and in support of subsequent audits of the submitted 1018 report, in addition to other related activities.

NASA HQ Response: The NF1018 is a NASA award requirement for the property in the hands of NASA awardees. This activity should be accomplished all year round as the property is received, stored, consumed, and excessed, etc. The prime awardees are required to flow down the government requirements to their additional awardees working under their prime NASA awards. Awardees and anyone working under their awards should never wait until the last minute to accomplish these tasks.

3. Therefore, based on the above and the extensive experience I personally experienced completing and submitting the 1018 report for over ten years for two major prime contracts, I must question the accuracy of the values in 2a above and suggest that they need to be increased. Regarding the stated purpose of this requested review, in questioning the values in 2a above, I am suggesting a sizable increase in the stated respondent burden associated with that data collection and submittal.

NASA HQ Response: The NF1018 is a NASA award requirement for the property in the hands of NASA awardees. This activity should be accomplished all year round as the property is received, stored, consumed, and excessed, etc. The prime awardees are required to flow down the government requirements to their additional awardees working under their prime NASA awards. Awardees and anyone working under their awards should never wait until the last minute to accomplish these tasks. The NF1018 reporting requirement is considered to be part of the NASA awardees' overall management systems and, as such, the cost of reporting the NF1018 is included in the overhead or as General and Administrative expenses charged indirectly to NASA awards.

3. *Ways to enhance the quality , utility, and clarity of the information to be collected.*
 - a. I am unable to address this specific question. I have been retired from NASA for five years and do not have current information on information collection systems from which to formulate a reply.
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.*
 - a. I am unable to address this specific question. I have been retired from NASA for five years and removed from the business world. Therefore I do not have the most current information or knowledge

of more efficient forms of current information technology from which to formulate a logical and constructive reply.