

SUPPORTING STATEMENT – PART A

Defense Federal Acquisition Regulation Supplement (DFARS) Part 237, Service Contracting, associated DFARS Clauses at DFARS 252.237, DD Form 2062, and DD Form 2063 –OMB Control No. 0704-0231

Summary of Changes from Previously Approved Collection

- Increase in burden attributed to a significant increase in the number of solicitations containing the solicitation provision 252.237-7024 along with a corresponding increase in the number of unique contractors whose contracts will contain the clause 252.237-7023 that might require updates to the accepted plan.

1. Need for the Information Collection

This supporting statement justifies the information collection requirements for two DFARS solicitation provisions and two DFARS contract clauses:

- a. DFARS provision 252.237-7000, Notice of Special Standards of Responsibility, is prescribed at DFARS 237.270(d)(1) for use in solicitations for the acquisition of audit services.
- b. DFARS clause 252.237-7011, Preparation History, is prescribed at 237.7003(a)(8) for use in all mortuary service solicitations and contracts. DD Forms 2062 and 2063 are used in conjunction with this clause.
- c. DFARS provision 252.237-7024, Notice of Continuation of Essential Contractor Services, is prescribed at 237.7603(b) for use in solicitations involving the acquisition of services that support mission-essential functions and that include the clause at 252.237-7023.
- d. DFARS clause 252.237-7023, Continuation of Essential Contractor Services, is prescribed at 237.7603(a) for use in solicitations and contracts for services that support mission-essential functions.

2. Use of the Information

The information collected under this clearance is used as follows:

- a. DFARS 252.237-7000(c) – to verify that the offeror is properly licensed in the state or other political jurisdiction where the offeror operates its professional practice.
- b. DFARS 252.237-7011, the DD Form 2062, Record of Preparation and Disposition of Remains (Outside CONUS), and the DD Form 2063, Record of Preparation and Disposition of Remains (Within CONUS) – to verify that the deceased's remains have been properly cared for by the mortuary contractor.
- c. DFARS 252.237-7024 – to assess the offeror's capability to continue providing

contractually required services to support the DoD component's mission-essential functions during periods of crisis.

d. DFARS 252.237-7023 – allows the contracting officer to provide approval of updates to the contractor's plan, provided under 252.237-7024, to ensure that the contractor can continue to provide services in support of the DoD component's required mission-essential functions during crisis situations.

3. Use of Information Technology

Information technology is used to the maximum extent possible. Where both the Government and the offeror or contractor is capable of electronic interchange, the information collection requirements may be submitted electronically, and the usage of information technology is 100 percent.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. Burden on Small Business

This information collection does not impose a significant economic impact on a substantial number of small businesses.

6. Less Frequent Collection

Failure to collect this information may result in the following:

a. DFARS 252.237-7000 – the award of a contract to an offeror that is not licensed to operate by the cognizant state or other licensing authority.

b. DFARS 252.237-7011 – the inability to verify the preparation history in a timely manner, thereby incurring unnecessary expense or the risk of improper care of the remains.

c. DFARS 252.237-7024 and 252.237-7023 – the inability to ensure contractors have adequate continuity plans, which increases the risk that Government operations may be severely impaired during crisis situations.

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

a. Public Notice

i. A 60-day notice for the collection was published in the *Federal Register* on Friday, October 29, 2021 at 86 FR 60003. No comments were received during the 60-day comment period.

ii. A 30-day notice for the collection was published in the *Federal Register* on Friday, January 28, 2022, at 87 FR 4572.

b. Consultation

The availability of requested information, frequency of collection, and other aspects of the information collections addressed in this supporting statement were discussed with various subject matter experts, including the Defense Contract Audit Agency (DCAA) and the Defense Prisoner of War/Missing in Action Accounting Agency, the Deputy Chief of Naval Operations, U.S. Navy, and the Office of the Undersecretary (Personnel and Readiness) (USD(P&R)).

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection, other than remuneration to contractors under their contracts.

10. Confidentiality

This information is disclosed only to the extent consistent with prudent business practices and current regulatory, statutory, and Freedom of Information Act requirements. No assurance of confidentiality is provided to respondents. A Privacy Act Statement is not required for this collection, because DoD is 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 personally identifiable information (PII). A Privacy Impact Assessment (PIA) is not required for this collection because PII is not being collected electronically.

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

a. 252.237-7000, Notice of Special Standards of Responsibility.

1. Estimation of Respondent Burden

Review of data from both the Federal Procurement Data System (FPDS) and Electronic Data Access (EDA) system obtained for fiscal year (FY) 2020 reveals that approximately 8 unique vendors (respondents) received contracts for audit support services during this timeframe.

Discussion with a representative from DCAA confirms that the estimated amount of time it takes to furnish the requisite documentation is 0.5 hour (30 minutes). Based on this information, the estimated annual public burden associated with DFARS 252.237-7000 is estimated as follows:

Estimation of Respondent Burden Hours: 252.237-7000	
Number of respondents	8
Number of responses per respondent	1
Number of total annual responses	8
Hours per response	0.5
Annual respondent burden hours (Total annual responses * hours per response)	4

2. Labor Cost of Respondent Burden

The estimated cost per hour of \$47.84 is based on the 2021 GS-11/Step 5 base hourly rate of \$35.11 plus 36.25 percent burden (pursuant with OMB Memorandum M-08-13) of \$12.73 per hour; the rate is rounded to the nearest dollar or \$48.

Labor Cost of Respondent Burden: 252.237-7000	
Number of total annual responses	8
Hours per response	0.5
Cost per hour (hourly wage)	\$48
Labor burden per response	\$24
Annual Labor Burden	\$192

b. 252.237-7011, Preparation History; the DD Form 2062, Record of Preparation and Disposition of Remains (Outside CONUS); and the DD Form 2063, Record of Preparation and Disposition of Remains (Within CONUS).

1. Estimation of Respondent Burden

The clause requires the contractor to provide a written summary of the results of the embalming process on a certificate furnished by the contracting officer. According to the DoD subject matter expert consulted for this clause, generally the DD Forms 2062 and 2063 are used for this purpose. The contractual vehicles used by DoD for mortuary services are regionally-issued, requirements-type contracts, although under certain circumstances purchase orders may be used. When mortuary services are needed, a task order or purchase order for this support is issued by the contracting activity. Since the contractor is required to provide the written summary of the mortuary services rendered at the order level, this paperwork burden analysis is predicated on order level information.

i. DD Form 2062. The source data used to develop the estimated number of

respondents and responses per respondent for the DD Form 2062 was obtained from subject matter experts in the USD(P&R) Office of Casualty, Mortuary Affairs and Military Funeral Honors. This form is used to identify approximately 500 remains each year. Approximately 100 funeral homes will spend approximately 30 minutes completing their portion of the form. Based on this information, the following the estimated public burden hours are calculated:

Estimation of Respondent Burden Hours: DD Form 2062	
Number of respondents	100
Number of responses per respondent	5
Number of total annual responses	500
Hours per response	0.5
Annual respondent burden hours (Total annual responses * hours per response)	250

ii. DD Form 2063. The source data used to develop the estimated number of respondents and responses per respondent for the DD Form 2063 was obtained from FPDS and EDA. Examination of FPDS and EDA data for FY 2020 reveals that the average number of purchase orders and task orders issued by DoD for mortuary services is approximately 27 orders per year to approximately 9 unique contractors. The average number of responses per respondent is approximately 3 (27/9). According to the subject matter expert familiar with DoD’s mortuary policies, each written summary requires approximately 0.5 hour (30 minutes) to prepare. Based on this information, the following the estimated public burden hours are calculated:

Estimation of Respondent Burden Hours: DD Form 2063	
Number of respondents	9
Number of responses per respondent	3
Number of total annual responses	27
Hours per response	0.5
Annual respondent burden hours (Total annual responses * hours per response)	14

2. Labor Cost of Respondent Burden

i. DD Form 2062. The estimated cost per hour is based on the 2021 GS-9/Step 5 base hourly rate of \$29.02 plus 36.25 percent burden (pursuant with OMB Memorandum M-08-13) of \$10.52 per hour; the rate of \$39.54 is rounded to the nearest dollar or \$40.

Labor Cost of Respondent Burden: DD Form 2062	
Number of total annual responses	500
Hours per response	0.5
Cost per hour (hourly wage)	\$40

Labor burden per response	\$20
Annual Labor Burden	\$10,000

ii. DD Form 2063. The estimated cost per hour is based on the 2021 GS-9/Step 5 base hourly rate of \$29.02 plus 36.25 percent burden (pursuant with OMB Memorandum M-08-13) of \$10.52 per hour; the rate of \$39.54 is rounded to the nearest dollar or \$40.

Labor Cost of Respondent Burden: DD Form 2063	
Number of total annual responses	27
Hours per response	0.5
Cost per hour (hourly wage)	\$40
Labor burden per response	\$20
Annual Labor Burden	\$540

c. 252.237-7024, Notice of Continuation of Essential Contractor Services, and 252.237-7023, Continuation of Essential Contractor Services.

1. Estimation of Respondent Burden

42 U.S.C. 5195 provides the statutory authority for executive agencies to have a comprehensive emergency preparedness system. Within DoD, this policy is implemented through several directives and instructions, namely DoD Directive 3020.26 and DoD Instruction 3020.42, which outline the responsibilities for carrying out mission-essential functions in the event of an emergency.

i. DFARS 252.237-7024, Notice of Continuation of Essential Contractor Services. The provision at 252.237-7024 requires offerors to submit a written plan concurrently with their offer, describing how it will continue to perform essential contractor services in support of designated mission-essential functions.

The annual public burden estimates for this provision are based on information obtained from the Electronic Document Access (EDA) system for FY 2020. The advantage of using EDA as opposed to FPDS in this instance is that EDA can provide individualized acquisition-related information, such as the incorporation of a specific clause within a contract. Analysis of the EDA data reveals that approximately 10,005 contracts containing the clause at 252.237-7023 were awarded. DFARS 237.7602(b) prescribes the inclusion of the provision 252.237-7024 in all solicitations for services that include the clause at 252.237-7023.

Further examination of the EDA data reveals that 1,572 unique contractors received these awards. The estimated number of offerors that would have submitted a written plan, known as the Mission-Essential Contractor Services Plan, was arrived at by multiplying the number of unique contractors by four, which equates to 6,288 offerors (1,572 X 4). As will be

explained in the burden analysis for the clause, the number of responses per respondent (the offeror) is approximately 1.3, therefore the estimated number of offers containing a Mission-Essential Contractor Services Plan (responses) is 6,288 (6,288 X 1.0). Finally, consultation with the subject matter expert familiar with the requirements of the provision reveals that the average amount of time expended by the respondent per response is 2 hours. Based on this information, the estimated public burden for 252.237-7024 is calculated as follows:

Estimation of Respondent Burden Hours: 252.237-7024	
Number of respondents	6,288
Number of responses per respondent	1.0
Number of total annual responses	6,288
Hours per response	2
Annual respondent burden hours (Total annual responses * hours per response)	12,576

ii. DFARS 252.237-7023, Continuation of Essential Contractor Services.

Contractors awarded a contract that involves the performance of an essential contractor service must maintain and update their Mission-Essential Contractor Services Plan as needed. The analysis of the public burden associated with this clause also relied on FY 2020 EDA information. As previously mentioned, a total of 10,005 contracts were awarded that contained the clause and the number of unique contractors (respondents) that received these contracts is 1,572. This number of respondents is not additive to the overall total number of respondents under this collection, as these respondents are in the same pool of respondents that submitted responses under 252.237-7024. The number of responses per respondent is 6.36 (10,005/1,572). Compliance with the clause entails the maintenance and updating of an existing plan. The subject matter expert familiar with the requirements of the clause estimates that the amount of time needed to maintain and update a plan averages 0.5 hour (30 minutes). Based on this information, the calculation for the estimated public burden associated with this requirement is as follows:

Estimation of Respondent Burden Hours: 252.237-7023	
Number of respondents	1,572
Number of responses per respondent	6.36
Number of total annual responses	10,005
Hours per response	0.5
Annual respondent burden hours (Total annual responses * hours per response)	5,003

2. Labor Cost of Respondent Burden

i. DFARS 252.237-7024. The estimated cost per hour is based on the 2021 GS-9/Step 5 base hourly rate of \$29.02 plus 36.25 percent burden (pursuant with OMB Memorandum M-08-13) of \$10.52 per hour; the rate of \$39.54 is rounded to the nearest dollar or \$40.

Labor Cost of Respondent Burden: 252.237-7024	
Number of total annual responses	6,288
Hours per response	2
Cost per hour (hourly wage)	\$40
Labor burden per response	\$80
Annual Labor Burden	\$503,040

ii. DFARS 252.237-7023. The estimated cost per hour is based on the 2021 GS-9/Step 5 base hourly rate of \$29.02 plus 36.25 percent burden (pursuant with OMB Memorandum M-08-13) of \$10.52 per hour; the rate of \$39.54 is rounded to the nearest dollar or \$40.

Labor Cost of Respondent Burden: 252.237-7023	
Number of total annual responses	10,005
Hours per response	0.5
Cost per hour (hourly wage)	\$40
Labor burden per response	\$20
Annual Labor Burden	\$200,100

d. Total for 252.237-7000, 252.237-7011 (DD Forms 2062 and 2063), 252.237-7024, and 252.237-7023.

1. Total Submission Burden

The total estimated burden hours for DFARS 252.237-7000, 252.237-7011 (DD Forms 2062 and 2063), 252.237-7024, and 252.237-7023 are provided in the following table:

Estimation of Respondent Burden Hours: 0704-0231	
Total number of respondents	6,405
Total number of annual responses	16,828
Total burden hours	17,847

2. Overall Labor Burden

The total estimated labor cost of the respondent burden for DFARS 252.237-7000, 252.237-7011 (DD Forms 2062 and 2063), 252.237-7024, and 252.237-7023 is provided in the following table:

Labor Cost of Respondent Burden: 0704-0231	
Total number of annual responses	16,828

Annual Labor Burden	\$713,872
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13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents, other than the burden costs addressed in Item 12.

14. Cost to the Federal Government

a. 252.237-7000, Notice of Special Standards of Responsibility. The estimated number of responses, cost per hour, and the methodology used to derive these estimates is provided in 12(a). The DCAA subject matter expert estimates that the amount of time it takes the Government to review each response is 0.25 hours (15 minutes). Based on this information, the following calculation of the Government burden associated with this provision is as follows:

Labor Cost to the Federal Government: 252.237-7000	
Number of total annual responses	8
Hours per response	0.25
Cost per hour (hourly wage)	\$48
Cost per response	\$12.00
Total cost	\$96

b. 252.237-7011, Preparation History; the DD Form 2062, Record of Preparation and Disposition of Remains (Outside CONUS); and the DD Form 2063, Record of Preparation and Disposition of Remains (Within CONUS). The estimated number of responses, cost per hour, and the methodology used to derive these estimates is provided in 12(b).

i. DD Form 2062. According to the subject matter experts in the Office of Casualty, Mortuary Affairs and Military Funeral Honors, the embalmer will spend 30 minutes preparing the form for each of the 500 responses; the mortuary officer will spend 5 minutes reviewing approximately 200 responses, and the case manager will spend 5 minutes reviewing approximately 200 responses. As such, the total estimated hours for the Government to review the contractor's written summary on the DD Form 2062 is as follows:

Embalmer	0.5 hours x 500 responses = 250 hours
Mortuary Officer	0.08 hours x 200 responses = 16 hours
<u>Case Manager</u>	<u>0.08 hours x 200 responses = 16 hours</u>
TOTAL	282 hours
	(0.564 hour per response)

Based on this information, the following calculation of the Government burden associated with this clause is as follows:

Labor Cost to the Federal Government: DD Form 2062
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Number of total annual responses	500
Hours per response	0.564
Cost per hour (hourly wage)	\$40
Cost per response	\$22.56
Total cost	\$11,280

ii. DD Form 2063. The subject matter expert for mortuary support services states that the Government requires approximately 0.25 hours (fifteen minutes) to review the contractor’s written summary on the DD Form 2063. Based on this information, the following calculation of the Government burden associated with this clause is as follows:

Labor Cost to the Federal Government: DD Form 2063	
Number of total annual responses	27
Hours per response	0.25
Cost per hour (hourly wage)	\$40
Cost per response	\$10
Total cost	\$270

c. 252.237-7024, Notice of Continuation of Essential Contractor Services, and 252.237-7023, Continuation of Essential Contractor Services. The estimated number of responses, cost per hour, and the methodology used to derive these estimates is provided in 12(c) (1) and 12(c)(2). The subject matter expert familiar with the requirements associated with both the provision and the clause estimates that the amount of time needed to (1) review an offeror’s Mission-Essential Contractor Services Plan; and (2) review any required updates to the contractor’s plan is 0.5 hours (30 minutes). The following calculation of the estimated Government burden is provided:

Labor Cost to the Federal Government: 252.237-7024	
Number of total annual responses	6,288
Hours per response	0.5
Cost per hour (hourly wage)	\$40
Cost per response	\$20
Total cost	\$125,760

Labor Cost to the Federal Government: 252.237-7023	
Number of total annual responses	10,005
Hours per response	0.5
Cost per hour (hourly wage)	\$40
Cost per response	\$20
Total cost	\$200,100

d. Total for 252.237-7000, 252.237-7011 (DD Forms 2062 and 2063), 252.237-7024, and 252.237-7023

Overall Labor Burden to the Federal Government: 0704-0231	
Total number of annual responses	16,828
Total Labor Burden	\$337,506

15. Reasons for Change in Burden

There are some changes in burden since the last approval. There is an increase in the salary rates per the Office of Personnel Management’s General Schedule for 2021. The primary change is attributed to the significant increase in the number of solicitations containing the provision 252.237-7024 along with a corresponding increase in the number of contractors (unique vendors) whose contracts will contain clause 252.237-7023 that might require updates to the accepted plan. As noted earlier in this statement, the annual public burden estimates for the provision 252.237-7024 are based on information obtained from the Electronic Document Access (EDA) system for FY 2020. The advantage of using EDA as opposed to FPDS in this instance is that EDA can provide individualized acquisition-related information, such as the incorporation of a specific clause within a contract. There is also reflected a decrease in the number of respondents for the clause 252.237-7000; and a decrease in number of respondents and total contracts for the clause 252.237-7011, DD Form 2063.

OMB Control No. 0704-0231	FY 2018	FY 2022	Change
Number of respondents	2,737	6,405	+3,668
Number of responses	4,019	16,828	+12,809
Estimated hours (number of responses multiplied hours per response)	6,051	17,847	+11,796
Annual public burden (estimated hours multiplied by cost per hour)	\$193,694	\$713,872	+\$520,178

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

DoD is not seeking approval to not display the expiration dates for OMB approval of the information collection.

18. Exceptions to “Certification for Paperwork Reduction Submissions”

DoD is not requesting any exemptions to the provisions stated in 5 CFR 1320.9.