

Supporting Statement
Federal Aviation Administration Acquisition Management System
(FAAAMS)
OMB 2120-0595

This revision includes two Information Collections (1) Solicitations and (2) Post-Award Contract Administration. The prior included three Information Collections (1) Market Surveys/Requests for Information (2) Solicitations and (3) Post-Award Contract Administration. The determination to remove the “Market Surveys/Requests for Information” Information Collection more accurately captures how FAAAMS collects information.

1. Explain the circumstances making collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

This is an information collection of the Federal Aviation Administration’s Acquisition Management System (FAAAMS). The Acquisition Management System (AMS) establishes policies and internal procedures for FAA acquisition. Section 348 of Public Law 104-50 directed FAA to establish an acquisition system; Section 348 states, in part:

“[T]he Federal Aviation Administration shall develop and implement, not later than January 1, 1996, an acquisition management system for the Federal Aviation Administration that addresses the unique needs of the agency and, at a minimum, provides for more timely and cost-effective acquisitions of equipment and materials.”

The information collection is necessary to solicit, award, and administer contracts for supplies, equipment, services, facilities, and real property to fulfill FAA’s mission.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The information collection is carried out as an integral part of FAA’s acquisition process. Various portions of the AMS describe information needed from vendors seeking or already doing business with FAA. FAA’s contracting offices collect the information to plan, solicit, award, administer and close out individual contracts. FAA’s small business office collects information to promote and increase small business participation in FAA contracts. Activities for this information collection involve the reporting of information. Responses are voluntary in some cases, but in other cases are required to obtain a benefit (such as responses to Requests for Offers leading to award of a contract). These information collection practices aid in ensuring AMS compliance at large.

AMS requires information collection through a series of forms in the areas of (1) Solicitations and (2) Post-Award Contract Administration. The specific information collected varies by the nature of each form. It is important to note the FAA uses forms specific to the agency. FAA uses forms similar to government wide standard forms. The FAA forms differ from standard forms as they are tailored or prescribed by AMS. Though the forms differ, they do however largely mirror their counterpart standard forms while containing minor editorial changes to account for them being prescribed by the AMS.

Solicitations – The FAA utilizes solicitations to evaluate vendor-specific technical solutions, capabilities, and other qualifications such as subcontracting plans that may result in the award of a contract for a defined FAA need. The extent and nature of the information required from vendors varies depending on the nature of the goods and/or services procured, as well as the size and complexity of the FAA requirements.

Post-Award Contract Administration – Depending on the complexity and size of the contract, various activities are ongoing after contract award in areas such as bonds (e.g. construction contracts), small business subcontracting (e.g. applying to large businesses), the tracking and management of Government Property, and invoicing. Contract modifications vary from routine administrative updates to major additions of work.

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

FAA readily uses information technology to reduce the burden of information collection. Information requests and submissions are exchanged electronically through email and web portals. FAA also uses other electronic acquisition aids and relies on other existing Government-wide web portals to collect information. AMS Forms are in electronic format and available online on the FAA Acquisition System Toolset (FAST) webpage ([FAA FAST Home Page](#)). All contract files are required to be in electronic format with very limited exceptions such as those requiring a raised seal indicating authenticity. While not all AMS Forms require a signature, the use of electronic signatures is encouraged overall and requirements for electronic signatures have been fully specified in the AMS with the assistance of FAA Information Security.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

FAA continuously reviews existing and proposed AMS requirements to eliminate and minimize duplication in information collection. Although each contracting action is unique, data collection requirements maximize use of data already maintained or regularly submitted by vendors doing business with the Federal Government. When possible, FAA uses information collected through other Government sources, such as vendor data in the System for Award Management (SAM). The information collected from vendors is needed to protect Government and taxpayer interests when contracting for products and services.

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

AMS processes were designed to minimize burden on all vendors doing business with FAA, including small businesses. The burden on small businesses or other small entities is kept to the minimum necessary to meet the specific objectives of a solicitation or contract. The current information collection does not have a significant economic impact on small businesses or other small entities. Flexibility within AMS has greatly had a positive impact on small businesses as a whole and has resulted in small businesses receiving a higher volume of contracts.

6. Describe the consequences 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.

There are policy and legal obstacles to reducing or eliminating the burden. If the current information collection is not conducted or is conducted less frequently, it would negatively impact FAA's ability to conduct acquisitions, effectively monitor contractor performance and ensure compliance. Reducing the burdens would also adversely impact the FAA's mission of fielding needed air traffic control systems, equipment, and services for the purpose of providing the safest and most efficient aviation system. Failure to collect or reducing the current burden would also heighten the risk of fraud, waste, and abuse.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document; requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

The FAA may occasionally request information (i.e. response to solicitation for offers) requiring respondents to prepare a response in fewer than 30 days for urgent circumstances or when conducting a commercial and/or simplified acquisition. Respondents may also be required by contract to submit information more often than quarterly (e.g. monthly) for contract compliance. An example of a monthly reporting collection requirement is a project progress plan.

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain

their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A Federal Register Notice published on September 1, 2022 (87 FR 53823) solicited public comment. No comments were received. The communication with stakeholders during the approval period has been the standard communication that transpires between the FAA and FAA stakeholders during the acquisition process. The acquisition process requires continuous communication between FAA and FAA stakeholders due to the nature of acquisition and the FAAAMS.

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

FAA does not provide payments or gifts of any kind to respondents.

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

FAA does not give respondents assurance of confidentiality; however, FAA protects certain proprietary information and rights in data when appropriately designated by vendors and contractors.

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

There are no questions of a sensitive nature.

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

The methodology for identifying requirements for information collection relies on AMS Forms and reporting requirements. In the present estimates, the forms are the basis for calculating the burden hours and costs, supplemented in certain cases, as necessary, by recourse to the AMS text. AMS requires information collection through a series of forms in the areas of (1) Solicitations and (2) Post-Award Contract Administration.

We estimate that the applicable hourly burden rate for the public to produce the information required is \$106.93 per hour. This is based on the previous submittal rate of \$104.96, adjusted for inflation using escalation rates from IHS Markit Employment Cost Indexes (ECIs), Second Quarter 2022 forecast, Wages and Salaries “Professional and Related”

(<https://www.spglobal.com/marketintelligence/en/mi/products/us-economic-short-long-term-forecasts.html>), as follows:

FY 19	
Escalation	Total FY 19 Rate
N/A	\$104.26 (2019 PRA Calculation)

FY 20	
Escalation	Total FY 20 Rate

Average of 3 Year Rate
\$ 106.93

102.30%	\$106.66
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FY 21	
Escalation	Total FY 21 Rate
103%	\$109.86

(1) Solicitations

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	3,461		
# of Responses per respondent	1		
Time per Response	3 hours		
Total # of responses	3,461		
Total burden (hours)	10,383		
Wage Rate	\$106.93		
Public Cost	\$1,110,254.19		

The estimated annual public burden cost for Solicitations is \$1,110,254.19.

(2) Post-Award Contract Administration

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents	10,177		
# of Responses per respondent	3		
Time per Response	23 hours		

Total # of responses	30,531		
Total burden (hours)	702,213		
Wage Rate	\$106.93		
Public Cost	\$75,087,636.09		

The estimated annual public burden cost for Post-Award Contract Administration is \$75,087,636.09.

The estimated annual total public burden cost for both Information Collections is \$76,197,890.28.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.

FAA estimates no additional costs associated with this collection.

14. Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

FAA estimates the Government’s average annual burden to review and evaluate the information to be 298,444 hours. This was calculated by taking an average of the amount of awards for FY 19, 20 and 21 and multiplying the average by the “Estimated Total Burden Hours” for respondents and multiplying that number by .5, as it was determined that the Government’s burden is approximately half the amount of time as the respondents burden. This includes all AMS acquisition activities (solicitation, evaluation, award, and administration) requiring information and record keeping.

FAA applies an average hourly rate of \$63.37. This calculation comes from the averaging of the base rate of a GS-12 Step 5, for the locality pay area of Washington-Baltimore-Arlington, DC-MD-VA-WV-PA for FY 19, 20 and 21 (\$46.51) and applying a burden rate of 36.25% (from OMB Memo M-08-13 Update to Civilian Position Full Fringe Benefit Cost Factor, Federal Pay Raise Assumptions, and Inflation Factors used in OMB Circular No. A-76, “Performance of Commercial Activities”), for a fully-burdened rate of \$63.37.

Based on this, FAA estimates that the Government’s total estimated annual burden cost to be approximately \$18,912,426 when the rounded burdened rate is multiplied by the hours.

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

For this renewal, FAA conducted thorough analysis to re-evaluate available data. This extensive, improved examination of information collection activities disclosed that overall burden is lower than previously estimated. Additionally, one information collection (IC) (Market

Surveys/Requests for Information) was removed as the examination determined the IC to be non-relevant and/or redundant. It is also a possibility that the year-to-year variance in contracting activities as of a result of the COVID-19 pandemic led to atypical data points.

16. For collections of information whose results will be published, outline plans for tabulation, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

There is no requirement for any information collected under AMS to be published for statistical use.

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.

FAA is seeking approval to not display an expiration date. AMS is an integrated and unified system that provides streamlined methods and initiates innovative processes to conduct timely and cost-effective procurements. This is achieved in part via AMS promotion of open communications and access to information throughout the procurement process. Because many recurring AMS Forms are available for both on- and off-line use, it would not be practical to keep the forms dated and require FAA to destroy dated, unused stock or to change electronic versions. To do so would likely hinder FAA's mission-critical streamlined acquisition process.

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

There are no exceptions.