

## SUPPORTING STATEMENT – PART A

### OMB Control Number 0704-0398 – Defense Federal Acquisition Regulation Supplement (DFARS) Part 211, Describing Agency Needs, and Related Clause at DFARS 252.211

#### Summary of Changes from Previously Approved Collection

- Increase in estimated cost results from using hourly labor rates for fiscal year 2023.
- Increased volume and accuracy of GFP reporting and available data as a result of full implementation of the GFP module.
- Decreased cost per collection as a result of efficiencies provided by the GFP Module.

#### 1. Need for the Information Collection

This statement supports a request for revision and renewal of a currently approved collection under OMB Control Number 0704-0398 for Defense Federal Acquisition Regulation Supplement (DFARS) part 211, Describing Agency Needs, and the related clause at 252.211-7007, Reporting of Government-Furnished Property. DFARS 211.274-4, Policy for reporting of Government-furnished property, and the associated clause at 252.211-7007, Reporting of Government-Furnished Property, requires contractors to report data to the DoD Item Unique Identification (IUID) Registry on all serially-managed Government-furnished property (GFP), as well as contractor receipt of non-serially managed items, unless an exception applies. “Serially managed item” means an item designated by DoD to be uniquely tracked, controlled, or managed in maintenance, repair, and/or supply systems by means of its serial number. The clause provides a list of specific data elements contractors are to report to the IUID registry, as well as procedures for updating the registry.

#### 2. Use of the Information

DFARS clause 252.211-7007 strengthens the accountability and end-to-end traceability of GFP within DoD. Through electronic notification of physical receipt, the contracting officer and requirements officials are made aware that GFP has arrived at the contractor’s facility. The DoD logistics community uses the information as a data source of available DoD equipment. In addition, the DoD organization responsible for contract administration uses the data to test the adequacy of the contractor’s property management system.

#### 3. Use of Information Technology

Information technology is used to collect the covered information to the maximum extent practicable (100%). As required by DFARS 252.211-7007, contractors report GFP data electronically to the DoD IUID Registry of the GFP Module, which is the DoD data repository that receives input from both industry and Government sources and provides storage of, and access to, data that identifies and describes tangible Government personal property.

#### 4. Non-duplication.

As a matter of policy, DoD reviews the Federal Acquisition Regulation (FAR) and DFARS to determine whether adequate language already exists. This information collection does not duplicate any other requirement.

#### 5. Burden on Small Business

The burden applied to small businesses is the minimum consistent with applicable laws, Executive orders, regulations, and prudent business practices.

#### 6. Less Frequent Collection

This information is collected only when GFP is provided to contractors to account for and manage DoD GFP. If the information required by DFARS 252.211-7007 is not collected, then effective accountability and management of GFP will be compromised.

#### 7. Paperwork Reduction Act Guidelines

There are no special circumstances for collection. Collection of this information is consistent with the guidelines at 5 CFR 1320.5(d)(2).

#### 8. Consultation and Public Comments

##### a. Public Notice

i. Public comments were solicited in the *Federal Register* on March 30, 2023 ([88 FR 19100](#)). No comments were received in response to this notice.

ii. A notice of submission to OMB for clearance of this information collection was published in the *Federal Register* on June 23, 2023 ([88 FR 41089](#)).

##### b. Consultation

DoD subject matter experts were consulted regarding the renewal of this information collection.

#### 9. Gifts or Payment

DoD will not provide a payment or gift to respondents under this information collection requirement, other than remuneration of contractors under their contracts.

#### 10. Confidentiality

This information is disclosed only to the extent consistent with statutory requirements, current regulations, and prudent business practices. 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. The collection of information does not include and personally identifiable information; therefore, no Privacy Impact Assessment or Privacy Act System of Records Notice is required.

11. Sensitive Questions

No sensitive questions are involved in the information collection.

12. Respondent Burden and its Labor Costs

Estimated respondent burden and labor costs are based on input and analysis from DoD subject matter experts, using the GFP Module in the Procurement Integrated Enterprise Environment (PIEE).

a. Number of Respondents: DoD estimates that 3,503 respondents (the average number of contractors that were registered in the GFP Module annually) are responsible for adhering to reporting requirements under DFARS 252.211-7007 on an annual basis.

b. Number of Responses: DoD estimates that 416,771 responses (the average total number of property transfer transactions initiated by DoD each year) are entered into the GFP Module by contractors on an annual basis.

c. Hours per Response: According to DoD subject matter experts experienced in managing the GFP Module, it takes a respondent an average of 6 minutes to acknowledge receipt of Government property in a GFP tracking system.

Estimation of Respondent Burden: 252.211-7007	
Number of respondents	3,503
Responses per respondent <sup>1</sup>	119
Number of responses	416,771
Hours per response	0.1
Estimated hours (number of responses multiplied hours per response)	41,677
Cost per hour (hourly wage) <sup>2</sup>	\$51.00
Cost per response	\$5.10
Annual public burden (estimated hours multiplied by cost per hour)	\$2,125,532

<sup>1</sup> The responses per respondent is based on the number of responses (416,771) divided by the number of respondents (3503); rounded to the nearest whole number.

<sup>2</sup> Based on the salary table for GS-11/step 5 salary (\$37.53 an hour for base salary) plus 36.25 percent burden, rounded to the nearest dollar, or \$51 an hour. The burden rate used is that mandated by OMB memorandum M-08-13 for use in public-private competition. Reference Salary Table for GS employees, 2023-RUS, Effective January 2023, found at [www.opm.gov](http://www.opm.gov)

### 13. Respondent Costs Other than Burden Hour Costs

There are no annualized costs to respondents for this information collection other than the labor burden costs addressed in Item 12.

### 14. Cost to the Government

The estimated annual cost to the Government to review and analyze responses from contractors under this clause is shown in the following table. It is estimated that a GS-12, step 5, employee conducting this review will take an average of 6 minutes to review and analyze each response.

Estimation of Cost to the Government: 252.211-7007	
Number of responses	416,771
Hours per response	0.1
Estimated hours	41,677
Cost per hour (hourly wage) <sup>3</sup>	\$61.00
Cost per response	\$6.10
Cost to Government	\$2,542,297

### 15. Reasons for Change in Burden

There is no change in the information collection requirements covered under OMB Control Number 0704-0398. The change in burden is a result of the following:

a. DoD has fully implemented the GFP module in the PIEE systems. Use of the GFP module to collect GFP data has increased the accuracy and efficiency of the collection in comparison to the previous methodology. As a result, the volume of responses reported in the GFP module has increased significantly while the estimated hours to report the data has decreased.

b. DoD use of the GFP module has increased the Government's number of reviews as a direct result of the increased number of responses, however the estimated cost to review and analyze responses has decreased due to efficiencies provided by the GFP module.

c. The current Office of Personnel Management GS hourly labor rates for calendar year 2023 used to calculate the cost per hour have increased from the 2020 rates. The change in burden is as follows:

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<sup>3</sup> Based on the salary table for GS-12/step 5 salary (\$44.98 an hour for base salary) plus 36.25 percent burden, rounded to the nearest dollar, or \$61 an hour. The burden rate used is that mandated by OMB memorandum M-08-13 for use in public-private competition. Reference Salary Table for GS employees, 2023-RUS, Effective January 2023, found at [www.opm.gov](http://www.opm.gov)

0704-0398	2020	2023	Difference
Number of respondents	256	3,503	3,247
Responses per respondent	254	119	-135
Number of responses	65,000	416,771	351,771
Hours per response	0.25	0.1	-0.15
Estimated hours	16,250	41,667	25,417
Annual public burden	\$666,250	\$2,125,532	1,459,282

16. Publication of Results

Results of this collection will not be published.

17. Non-Display of OMB Expiration Date

DoD is not requesting approval to omit display of the expiration date of OMB approval on the instrument of collection.

18. Exceptions to “Certification for Paperwork Reduction Submissions”

There are no exceptions to the certification accompanying this Paperwork Reduction Act submission.