## <u>SUPPORTING STATEMENT - PART A</u>

Contractor's Flight Operations Forms; OMB Control Number 0704-0347

## Summary of Changes from Previously Approved Collection

- DD Form 1821 has been transferred to the information collection request from the now discontinued OMB Control Number 0704-0188.
- DD Form 1821 was revised reducing information collected with instructions added.
- There are no changes to the estimated response time or number of responses to these forms. Respondent cost burden has increased due to updated average hourly wage estimates. The total burden has also increased due to the addition of DD Form 1821.

## 1. <u>Need for the Information Collection</u>

Information collection via DD Forms 1821, 2627, 2628, and 3062 is required for the Department of Defense to perform Contract Administrative Services (CAS) under FAR 42.302(a)(56), *Maintain surveillance of flight operations responsibilities* for contractor operations. In accordance with the Defense Contract Management Agency Instruction (DCMA INST) 8210-1D, "Contractor's Flight and Ground Operations," contractors provide information on contractor personnel to the Government. The appointed Government Flight Representative (GFR) uses the information to approve contractor crewmember training and qualifications, as well as contract flights. The GFR must approve all flights under contract regardless of assigned crewmembers (i.e., Government or contractor).

#### 2. Use of the Information

The DD Form 2627, "Request for Government Approval for Aircrew Qualification and Training," is used by contractors to request qualification training for contractor crewmembers. The contractor provides a personal history, verifies the crewmember's records, and requests government approval for training in a particular type of government aircraft. The information is used by appointed GFRs to make the decision to approve the training and qualification requested. The contractor must ensure that crewmembers do not fly or initiate qualification training before receipt of Government approval. Once the GFR has approved the request he/she signs the form and returns it to the contractor's requesting official (CRO). Following approval, training must be initiated and completed without delay. The DD2627 and supporting documentation can be provided in hard or soft copy. The GFR maintains a copy of the DD2627 for no longer than 3 years.

The DD Form 1821, "Contractor Crewmember Record," is used by contractors to provide a succinct summary of a crewmember's flight history, including flying time, training experience, and more. This form is submitted with DD Form 2627 as part of the supporting documentation for the request for qualification training.

The DD Form 2628, "Request for Approval of Contractor Flight Crewmember," is used by contractors to request aircrew qualification for contractor crewmembers on completion of qualification training or designation. The contractor verifies the crewmember's training completion and requests GFR approval for specific aircrew qualification in a particular type of government aircraft. Once the GFR has approved the request he/she signs the form and returns it to the CRO. Contractor crewmembers must not perform in their aircrew specialties until receipt of Government approval. An approved DD Form 2628 is valid as long as the crewmember maintains their qualifications for the contractor. The DD2628 and supporting documentation can be provided in hard or soft copy. The GFR maintains a copy for as long as the crewmember maintains his/her qualification, or until the contract ends.

The DD Form 3062, "Request for Flight Approval," is used by contractors to request approval of flights under contract. The DD3062 is approved by the cognizant GFR to authorize contractor personnel participation in the flight(s), document contractor personnel qualifications, and facilitate the Service organization's flight management processes, and activate the Government's assumption of risk. Without approval, the contractor cannot fly under the liability coverage provided by DFARS 252.228-7001, Ground and Flight Risk. Once the GFR has approved the request he/she signs the form and returns it to the CRO. The DD3062 can be provided in hard or soft copy. The GFR maintains a copy for 1 year.

Due to the varied nature of contracts with numerous contractors and hundreds of contractor flight crewmembers, the respondent and labor cost burdens are estimates only. Some contractors will process the DD Forms 1821, 2627, and 2628 one or two times a year or less. Others process the same forms more than 50 times a month. Likewise, the DD Form 3062 may be executed daily or more by some contractors and not used at all by other contractors. However, those contractors that use a GFR's authorized substitute local form must still provide the same information.

## 3. <u>Use of Information Technology</u>

95% of forms are signed electronically. While contractors and GFRs have the option to use hard copies, the standard practice is to use only soft copies along with scanned supporting documents.

## 4. <u>Efforts to Identify Duplication</u>

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

## 5. <u>Burden on Small Businesses</u>

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

#### 6. Consequences of Less Frequent Collection

The DD Forms 1821, 2627, and 2628 are used once for new contractor crewmembers and once for those upgrading to other aircraft or duties. The forms do not need to be re-

accomplished unless the crewmember's qualification status will change, e.g., upgrading from mission pilot to instructor pilot, or obtaining qualifications in more than one aircraft.

The DD Form 3062 is used to approve single, daily, or weekly flights, and under certain conditions provided in DCMA INST 8210.1, Chapter 7, to cover a time frame of up to one month.

## 7. <u>Paperwork Reduction Act Certification</u>

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. Solicitation of Comments

A 60-Day Federal Register Notice for the collection published on Friday, May 5, 2023. The 60-Day FRN citation is 88 FR 29105.

No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice for the collection published on Friday, September 22, 2023. The 30-Day FRN citation is 88 FR 65374.

No additional consultation apart from soliciting public comments through the Federal Register was conducted for this submission.

## 9. <u>Gifts or Payment</u>

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

## 10. <u>Confidentiality</u>

A Privacy Act Statement is required for this collection. The PAS is included at the beginning of the form.

A copy of the SORN, PDCMA 1 DoD can be found at <a href="https://dpcld.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570147/pdcma-1-dod/">https://dpcld.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570147/pdcma-1-dod/</a> for OMB's review.

A Privacy Impact Assessment (PIA) is not required for this collection because PII is not being collected electronically.

Copies of the DD Forms 1821 and 2627 are maintained in the system until the contractor's requesting official (CRO) rescinds the training request, in which case the forms will be destroyed; or the crewmember completes flight training, at which time they will be destroyed and replaced with the DD Form 2628. Copies of the DD Form 2628 are maintained for as long as the crewmember maintains his/her qualification or the contract ends. Copies of the DD Form 3062 are maintained for 1 year.

## 11. <u>Sensitive Questions</u>

No questions considered sensitive are being asked in this collection.

## 12. Respondent Burden and its Labor Costs

#### Part A: ESTIMATION OF RESPONDENT BURDEN

#### Collection Instrument(s)

## [DD Form 1821]

- a) Number of Respondents: 100
- b) Number of Responses Per Respondent: 5
- c) Number of Total Annual Responses: 500
- d) Response Time: 45 minutes
- e) Respondent Burden Hours: 375 hours

## [DD Form 2627]

- a) Number of Respondents: 100
- b) Number of Responses Per Respondent: 5
- c) Number of Total Annual Responses: 500
- d) Response Time: 15 minutes
- e) Respondent Burden Hours: 125 hours

## [DD Form 2628]

- a) Number of Respondents: 100
- b) Number of Responses Per Respondent: 5
- c) Number of Total Annual Responses: 500
- d) Response Time: 15 minutes
- e) Respondent Burden Hours: 125 hours

# [DD Form 3062]

- a) Number of Respondents: 100
- b) Number of Responses Per Respondent: 52
- c) Number of Total Annual Responses: 5,200
- d) Response Time: 15 minutes
- e) Respondent Burden Hours: 1,300 hours

#### 2) Total Submission Burden

- a) Total Number of Respondents: 200
- b) Total Number of Annual Responses: 6,700
- c) Total Respondent Burden Hours: 1,925 hours

#### Part B: LABOR COST OF RESPONDENT BURDEN

## 1) Collection Instrument(s)

#### [DD Form 1821]

a) Number of Total Annual Responses: 500

- b) Response Time: 45 minutes
- c) Respondent Hourly Wage: \$82
- d) Labor Burden per Response: \$61.59
- e) Total Labor Burden: \$30,750

#### [DD Form 2627]

- a) Number of Total Annual Responses: 500
- b) Response Time: 15 minutes
- c) Respondent Hourly Wage: \$82
- d) Labor Burden per Response: \$20.5
- e) Total Labor Burden: \$10,250

#### [DD Form 2628]

- a) Number of Total Annual Responses: 500
- b) Response Time: 15 minutes
- c) Respondent Hourly Wage: \$82
- d) Labor Burden per Response: \$20.5
- e) Total Labor Burden: \$10,250

## [DD Form 3062]

- a) Number of Total Annual Responses: 5,200
- b) Response Time: 15 minutes
- c) Respondent Hourly Wage: \$82
- d) Labor Burden per Response: \$20.50
- e) Total Labor Burden: \$106,600

### 2) Overall Labor Burden

- a) Total Number of Annual Responses: 6,700
- b) Total Labor Burden: \$157,850

The Respondent hourly wage was determined by using the average salary for a contracting flight crewmember of \$169,540 per year.

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

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

## 14. <u>Cost to the Federal Government</u>

## Part A: LABOR COST TO THE FEDERAL GOVERNMENT

Collection Instrument(s)

# [DD Form 1821]

- a) Number of Total Annual Responses: 500
- b) Processing Time per Response: 30 minutes
- c) Hourly Wage of Worker(s) Processing Responses: \$49.99

- d) Cost to Process Each Response: \$25.00
- e) Total Cost to Process Responses: \$12,497.50

## [DD Form 2627]

- f) Number of Total Annual Responses: 500
- g) Processing Time per Response: 1 hour
- h) Hourly Wage of Worker(s) Processing Responses: \$49.99
- i) Cost to Process Each Response: \$49.99
- j) Total Cost to Process Responses: \$24,995.00

# [DD Form 2628]

- a) Number of Total Annual Response: 500
- b) Processing Time per Response: 1 hour
- c) Hourly Wage of Worker(s) Processing Responses: \$49.99
- d) Cost to Process Each Response: \$49.99
- e) Total Cost to Process Responses: \$24,995.00

## [DD Form 3062]

- a) Number of Total Annual Responses: 5,200
- b) Processing Time per Response: 5 minutes
- c) Hourly Wage of Worker(s) Processing Responses: \$49.99
- d) Cost to Process Each Response: \$4.17
- e) Total Cost to Process Responses: \$21,662.33
- 2) Overall Labor Burden to the Federal Government
  - a) Total Number of Annual Responses: 6,700
  - b) Total Labor Burden: \$84,149.83

The Respondent hourly wage was determined by using the Department of Defense's pay charts for 2023. They reflect the base pay for a Major/Lt Commander (O-4) with 12 years of service.

#### Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
  - a) Equipment: \$0
  - b) Printing: \$0
  - c) Postage: \$0
  - d) Software Purchases: \$0
  - e) Licensing Costs: \$0
  - f) Other: \$0
- 2) Total Operational and Maintenance Cost: \$0

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$84,149.83
- 2) Total Operational and Maintenance Costs: \$0
- 3) Total Cost to the Federal Government: \$84,150

### 15. Reasons for Change in Burden

For DD Forms 2627, 2628, and 3062 burden is increased due to updated average hourly wage estimates. There are no changes to the estimated response time or number of responses to these forms.

The total burden has also increased due to the addition of DD Form 1821, which was previously approved under the new discontinued OMB Control Number 0704-0188.

## 16. <u>Publication of Results</u>

The results of this information collection will not be published.

## 17. <u>Non-Display of OMB Expiration Date</u>

Yes, we are requesting approval to omit display of the OMB expiration date. The forms relate to contractual requirements regarding flight records. Maintaining consistent forms improves the stability of contractor operations. In the unintended case of expiration of the collection before re-approval, we do not wish to have respondent uncertainty regarding necessary completion of the form. The presence of an expiration date could lead to confusion in regards to correct completion of the form.

18. <u>Exceptions to "Certification for Paperwork Reduction Submissions"</u> We are not requesting an exemption to the provisions stated in 5 CFR 1320.9.