

SUPPORTING STATEMENT PART A

TITLE OF INFORMATION COLLECTION: Small Business Mentor Protégé Program

TYPE OF INFORMATION COLLECTION: Reinstatement with change of a previously approved collection

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

The NASA Mentor-Protégé Program is designed to incentivize NASA prime contractors to assist small disadvantaged business (SDB) concerns, Historically Black Colleges and Universities (HBCUs), minority institutions (MIs), women-owned small businesses (WOSB) concerns, veteran owned small businesses (VOSB), historically underutilized business zones (HUBZone), NASA SBIR Phase II companies or a nonprofit agency employing the blind or severely disabled (Ability One) in enhancing their capabilities to perform NASA contracts and subcontracts, foster the establishment of long-term business relationships between these entities and NASA prime contractors, and increase the overall number of these entities that receive NASA contract and subcontract awards.

Information is required by NASA to monitor the performance and progress of both the mentor and the protégé firms in this developmental assistance program, as delineated in the mentor-Protégé Agreement. The NASA Office of Small Business Programs (OSBP) is required to manage the Program. One of the internal controls established by the OSBP to achieve the stated program objectives, by serving as a check and balance against undesired actions or consequences, include the review of annual progress reports submitted by the mentors and protégé's, on the protégé's development against the master plan contained in the approved agreement. It is also imperative that regular surveillance occur on these mentor protégé arrangements since approved mentor firms are eligible to earn an award fee associated with their performance as a mentor under the Pilot Program.

The mentor and protégé's progress reports are required by NFS 1819.7213. These annual reports will serve as an internal control measure to achieve Agency objectives and by serving as a check and balance against undesired action or consequences. This requirement is codified at 48 CFR Subpart 1819.72.

2. Indicate how, by whom, and for what purpose the information is to be used.

The information, collected annually on 3 agreements (2022) will be utilized by the OSBP in its program management role to ensure that the Agency objectives are met. Specifically, the OSBP will utilize the reports as a method of determining if developmental assistance provided to small disadvantaged businesses (SDBs) by prime contractors meet the standards established in NASA policy, which is to enhance the SDB's "high-tech" capabilities. The prime contractor's performance will determine the degree to which the contractor will be incentivized by earning additional performance fee(s). The Agency's ability to manage the program effectively would be greatly diminished without receiving the described reports, which are part of the ongoing

performance fee evaluation process. Absent the reports, NASA would have to expend resources (financial and manpower) to monitor contractor performance by way of extensive site visits to firms approved for the Mentor-Protégé Program.

- 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, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection.**

Reporting is done primarily through electronic submissions via email. There is no known plan to implement web-based submissions.

- 4. Describe efforts to identify duplication.**

There is no duplication as there are no other sources available to collect this information.

- 5. If the collection of information impacts small businesses or other small entities (Item 5 of the OMB Form 83-I), describe the methods used to minimize burden.**

The mentor firms (i.e., large prime contractors) will prepare the reports, with some assistance from the protégés. Therefore, the impact on small businesses will be minimal.

- 6. Describe the consequence 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.**

The Mentor-Protégé Program is an initiative that has been institutionalized as a way of doing business and as such its effectiveness in promoting socioeconomic programs is measured through the collection of the semi-annual reports. To continually address the trends in Federal contracting with respect to small disadvantaged businesses, women-owned businesses, historically black colleges and universities, and other minority institutions, veteran owned small businesses, historically underutilized business zones, SBIR Phase II companies, the reports provide the necessary data as a means to evaluate the quality and quantity of subcontracts. In accordance with NASA FAR Supplement clause, 1852.219-79, Mentor Requirements and Evaluation, annual reports shall be submitted by the mentor to the NASA Mentor-Protégé Program Manager, NASA Headquarters OSBP, and include the following:

- (1) Specific actions taken by the contractor, during the evaluation period, to increase the participation of protégés as subcontractors and suppliers;
- (2) Specific actions taken by the contractor during this evaluation period to develop the technical and corporate administrative expertise of a protégé as defined in the agreement;
- (3) To what extent the protégé has met the developmental objectives in the agreement; and
- (4) To what extent the firm's participation in the Mentor-Protégé Program resulted in the protégé receiving competitive contract(s) and subcontract(s) from private firms and agencies other than the mentor.

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

None.

8. Provide the date and page number of publication in the Federal Register for the 60-day and 30-day FNRS, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB.

60-day FRN: Federal Register Volume 88, Number 9421 on 2/14/2023. No comments were received.

30-day FRN: Federal Register Volume 88, Number 53532 on 8/8/2023.

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

The incentives for a prime contractor performing as a mentor, center primarily on the mentor's ability to earn additional fees under the prime contract with NASA. The aforementioned annual progress reports are intended to become integrated into the fee evaluation process.

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

Information collected for this adheres to NASA Privacy Policy, NPD 1382.17K.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

Not applicable.

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

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Respondent category	Number of respondents	Estimated completion time	Annual burden
Contractor	10	1.5 hours	15 hours
TOTAL	10	1.5 hours	15 hours

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

The estimated annual cost to the contractor is calculated by multiplying the estimated hours by an estimated cost of \$40.00 per hour. The total is \$600; however, the respondents are government contractors, who will be reimbursed for their response to the collection, which

means they incur no real cost. Approximate contractor reimbursement for generation of reports – \$600 (\$40x15 hrs).

14. Cost to the Federal Government: Provide estimates of annualized costs to the Federal government.

Small Business Specialist review, incl. filing and record keeping - \$300 (\$50x6 hours).

15. Changes in Burden: Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I, if applicable.

Not applicable.

16. Publication of Results: For collections of information whose results will be published, outline plans for tabulation and publication.

Data from these reports may be used in Award Fee Evaluations which are not publicized but instead are only shared with the contractor and kept as a part of the contract files. Data from these reports may be included in annual reports initiated by the SDBU office.

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.

Not applicable.

18. Explain each exception to the "Certification for Paperwork Reduction Act Submissions."

The NASA office conducting or sponsoring this information collection does not take any exceptions and certifies compliance with all provisions.

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B. Collections of Information Employing Statistical Methods.

This information collection does not employ statistical methods.