

SUPPORTING STATEMENT – PART A
Defense Federal Acquisition Regulation Supplement Appendix I
OMB Control Number 0704-0332

Summary of Changes from Previously Approved Collection

- The burden was reduced slightly due to a decrease in the total number of respondents and total number of annual responses.

1. Need for the Information Collection

This justification supports a request for extension of an information collection requirement currently approved under OMB Control Number 0704-0332 for Defense Federal Acquisition Regulation Supplement (DFARS) Appendix I. Section 831 of the National Defense Authorization Act (NDAA) for Fiscal Year (FY) 1991 (Pub. L. 101-510, 10 U.S.C. 2302 Note, redesignated 10 U.S.C. 4902) required DoD to establish the DoD Pilot Mentor-Protégé Program (the “Program”).

Congress requires DoD to collect certain information from program participants in section 861, paragraph (b)(2), of Public Law 114-92. Thus, the need for this information collection is to comply with existing laws. DoD has incorporated these information collection requirements into the DFARS in section I-112 of Appendix I. Program participants agree to comply with these information collection requirements when they execute their mentor-protégé agreements, receiving the program’s benefits in consideration.

This information is necessary to ensure that participants are fulfilling their obligations under the mentor-protégé agreements and furthering the purpose of the Mentor-Protégé Program as required by section 18(d)(7) of the Small Business Act (15 U.S.C. 637(d)(7)). In accordance with 10 U.S.C. 4902, DoD uses the information to decide whether to approve continuation of the agreement. In addition, the information is necessary for program managers to direct developmental assistance to the most appropriate small business concerns and to ensure the program meets the Congressionally-mandated goal of enhancing the defense industrial base.

2. Use of the Information

DoD uses the information to ensure that participants are fulfilling their contractual obligations, and to assess whether the objectives of the DoD Pilot Mentor-Protégé Program are being attained. DoD also uses this data to determine whether to approve the continuation of agreements.

3. Use of Information Technology

Information technology is used to the maximum extent practicable. Program participants may submit the information electronically, and DoD may process the data collected electronically via Electronic Data Interchange. This means of collection was adopted to reduce

input errors and increase efficiency. It is estimated that approximately 90% of the responses will be collected electronically.

4. Non-duplication

The DoD Pilot Mentor-Protégé Program is unique to DoD; similar data collections from other Government sources or agencies do not exist. As a matter of policy, DoD reviews the Federal Acquisition Regulation (FAR) part 19, Small Business Programs, to determine if adequate language already exists. The language in DFARS Appendix I applies solely to DoD and is not considered duplicative of the language in FAR part 19.

5. Burden on Small Businesses

The collection is not expected to have a significant impact on a substantial number of small businesses. There are separate information collection requirements for protégés, who are small businesses, and for mentors, who are usually large businesses. The protégé is required to report annually, whereas the mentor is required to report twice as often. The protégé is only required to provide the minimum amount of information that will meet the statutory requirements, and those requirements are much less for protégés. Therefore, the burden applied to small business is the minimum consistent with applicable laws, Executive Orders, regulations, and prudent business practices.

6. Less Frequent Collection

If the information was collected less frequently, DoD would not be able to fulfill its responsibility of ensuring that participants were fulfilling their contractual obligations and that the Government was receiving value for the benefits it was providing.

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 July 26, 2023, at 88 FR 48212. 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 September 28, 2023, at 88 FR 66823.

b. Consultation

Subject matter experts within DoD were consulted regarding the renewal of this collection in order to calculate the burden.

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. DFARS Appendix I, I-112

1. Estimation of Respondent Burden

The estimate of public burden is based on the number of active agreements (75), the number of mentor firms (43), and the number of protégé firms (62) participating in the Program as of June 5, 2023. Data was provided by the Mentor-Protégé Program Coordinator. The hours per response are the same as they were in the previous supporting statement. Mentor firms report twice a year for each protégé agreement regarding details of the amount and impact of the assistance the mentors provided to the protégé under each agreement. Therefore, there are a total of 150 responses (75 x 2) per year for mentor firms, or approximately 3.49 responses per respondent.

Estimation of Respondent Burden Hours: Appendix I, I-112 (Mentor Firms)	
Number of respondents	43
Number of responses per respondent ((75x2)/43)	3.49
Number of total annual responses	150
Hours per response	3

Annual respondent burden hours	450
--------------------------------	-----

Protégé firms report once a year regarding their progress in terms of employment, revenue, and participation in DoD contracts. Therefore, there are a total of 62 responses (62 x 1) per year for protégé firms, or one response per respondent.

Estimation of Respondent Burden Hours: Appendix I, I-112 (Protégé Firms)	
Number of respondents	62
Number of responses per respondent	1
Number of total annual responses	62
Hours per response	1
Annual respondent burden hours	62

2. Labor Cost of Respondent Burden

The estimated cost of \$52.60 (rounded to \$53.00) per hour is based on the 2023 GS-12/Step 5 rate of \$38.61 plus a fringe benefit rate of 36.25 percent, which is \$13.99. The 36.25 percent fringe benefit was taken from OMB Memorandum M-08-13 dated March 11, 2008.

Labor Cost of Respondent Burden: Appendix I, I-112 (Mentor Firms)	
Number of total annual responses	150
Hours per response	3
Cost per hour (hourly wage)	\$53
Labor burden per response	\$159
Annual labor burden	\$23,850

Labor Cost of Respondent Burden: Appendix I, I-112 (Protégé Firms)	
Number of total annual responses	62
Hours per response	1
Cost per hour (hourly wage)	\$53
Labor burden per response	\$53
Annual labor burden	\$3,286

b. Total for DFARS Appendix I, I-112

1. Total Submission Burden

The total estimated burden hours for DFARS Appendix I, I-112 are provided in the following table:

Estimation of Respondent Burden Hours: 0704-0332	
Total number of respondents	105
Total number of annual responses	212
Total burden hours	512

2. Overall Labor Burden

The total estimated labor cost of the respondent burden for DFARS Appendix I, I-112 is provided in the following table:

Labor Cost of Respondent Burden: Appendix I-I-112	
Total number of annual responses	212
Annual Labor Burden	\$27,136

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. Cost to the Federal Government

a. Labor Cost to the Federal Government

The cost incurred by the Government is based on the time required to receive, review, and analyze the information submitted by the Program participants for each agreement in place. DoD estimates that it will take the Government approximately one hour to review and process the information in each response. The estimated cost of \$53.00 per hour is based on the 2023 GS-12/Step 5 rate of \$38.61 plus a fringe benefit rate of 36.25 percent. The 36.25 percent fringe benefit was taken from OMB Memorandum M-08-13 dated March 11, 2008.

Labor Cost to the Federal Government: Appendix I, I-112	
Number of total annual responses	212
Hours per response	1
Estimated hours (number of responses multiplied hours per response)	212
Cost per hour (hourly wage)	\$53

Cost per response	\$53
Annual public burden (estimated hours multiplied by cost per hour)	\$11,236

b. Operational and Maintenance Costs

There are no operational and maintenance costs associated with this information collection.

c. Total Cost to the Federal Government

Total labor burden	\$11,236
Total operational and maintenance costs	\$0
Total cost to the Federal Government	\$11,236

15. Reasons for Change in Burden

The burden was reduced due to a decrease in the total number of respondents and total number of annual responses.

Change in Burden	2018	2023	Difference
Number of respondents	127	105	-22
Total annual responses	255	212	-43
Total hours	595	512	-83
Cost per hour	\$46	\$53	+\$7
Total Costs	\$27,336	\$27,136	-\$200

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 omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to “Certification for Paperwork Reduction Submissions”

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