SUPPORTING STATEMENT – PART A

OMB Control Number 0704-0246

Defense Federal Acquisition Regulation Supplement (DFARS) part 245, Government Property, related clauses in DFARS 252, and related forms in DFARS 253

Summary of Changes from Previously Approved Collection:

- Decrease in burden hours due to the following:
 - O Development and use of automated procedures.
 - O Use of more recent data.
 - O Use of hourly wage rates for calendar year 2023.

1. Need for the Information Collection

This statement is in support of a revised information collection requirement associated with DFARS Case 2020-D029, Consolidation of DoD Government Property Clauses. DFARS Case 2020-D029 consolidates several existing Government property clauses into a new DFARS clause and updates the process from form-based reporting to primarily electronic processes by using the new Department of Defense (DoD) enterprise-wide eBusiness platform.

- a. <u>Information collection requirements in DFARS part 245 clauses</u>: The new proposed DFARS clause 252.245-70XX, Management and Reporting of Government Property, consolidates the requirements of four DFARS clauses. Of the four clauses only one, 252.211-7007, included an information collection burden (0704-0398) that is now being incorporated into this clearance request under the consolidated clause. In addition to consolidating the information collection requirements into a single clause, the clause implements an electronic process for the collection and management of required information. The information collected is required for the effective management of Government property. The consolidated clause does not impose any new information collection requirements.
- (i) <u>DFARS 252.245-70XX(b)(1)</u>. This paragraph streamlines reporting of Government-furnished property requirements under the Government Furnished Property (GFP) module of the Procurement Integrated Enterprise Environment (PIEE) eBusiness platform. The DD Form 1348-1A, Issue Release/Receipt Document, has been used when authorized by the plant clearance officer and is widely used outside the continental United States for turn-ins to the Defense Logistics Agency (DLA) disposal activities. The use of the paper form is no longer necessary, since the electronic equivalent is electronically generated through the GFP Module. Therefore, the paper form is no longer included in this information collection.
- (ii) <u>DFARS 252.245-70XX(k)</u>. Paragraph (k) provides procedures for disposal of scrap. The DD Form 1639, Scrap Warranty, is completed by individuals or firms that purchase Government property for its material content from a Government contractor. This form is used for the sole purpose of having the purchasers warrant that the property they have purchased will be used only as scrap.

- (iii) <u>DFARS 252.245-70XX(l)</u>. Paragraph (l) provides procedures for sale of surplus contractor inventory. After bid openings, the contractor is required to submit copies of the bid abstract to the plant clearance officer.
- (iv) <u>DFARS clause 252.245-7003</u>, <u>Contractor Property Management System Administration</u>. This clause addresses the requirement for certain contractors to respond in writing to an initial or final determination from the administrative contracting officer that identifies deficiencies in the contractor's property management system.
- b. <u>Information collections to be removed as a result of revisions</u>. The new DFARS clause 252.245-70XX incorporates the following portions of previously approved information collection burdens identified by the Office of Management and Budget (OMB) Control Numbers. Upon approval by OMB of the revised reporting requirements for 0704-0246, the following OMB Control Numbers will no longer be required and will be cancelled:
- (i) OMB Control Number 0704-0398, DFARS clause 252.211-7007, Reporting of Government-Furnished Property. This clause required contractors to report to the DoD Item Unique Identification (IUID) Registry all serially managed GFP as well as contractor receipt of non-serially managed items. "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. This requirement is now covered under DFARS clause 252.245-70XX, paragraph (b)(1)(i), so a separate OMB clearance is not warranted.
- (ii) OMB Control Number 0704-0557, DFARS part 245; Use of the Government Property Clause for Repair of Government-furnished Property. DFARS 245.107(1)(i) requires the use of Federal Acquisition Regulation (FAR) clause 52.245-1, Government Property, in all DoD purchase orders for repair, maintenance, overhaul, or modification of Government property regardless of the unit acquisition cost of the items to be repaired. The DFARS requirement for electronic notification of receipt provides assurance to the Government that repair assets have arrived at the contractor's repair facility. Moreover, in the case of repair items provided under purchase orders, contractors need only report the receipt of the repair item; no other reporting is required. This requirement is now covered under DFARS clause 252.245-70XX, paragraph (b) (1)(i), so a separate OMB clearance is not warranted.
- (iii) OMB Control Number 0704-0246, 245.302(1)(i); and 245.604-3(b)and (d). DFARS 245.302(1)(i) requires contractors to request approval to use Government property on work for foreign governments and international organizations. Requests of this type fall under the requirements of FAR clause 52.245-9, Use and Charges, and OMB Control Number 9000-0075. The sales procedures at DFARS 245.604-3 are covered in DFARS 252.245-70XX, paragraph (l).
- (iv) <u>Summary of adjustments</u>. Accordingly, the following DFARS text and clauses are eliminated by creation of the new consolidated clause, and the associated OMB Control Numbers for the segments cited will be cancelled upon publication of the 30-day notice and the final DFARS rule:

Ol	MB Control No.	DFARS Segment
•	0704-0557	245.107(1)
•	0704-0246	245.302(1)(i)
•	0704-0246	245.604-3(b)
•	0704-0246	245.604-3(d)
•	0704-0398	252.211-7007

The following three clauses are also removed and reserved in the DFARS as a result of creating the new consolidated clause; however, there are no information collection burdens associated with these clauses.

- 252.245-7001, Tagging, Labeling, and Marking of Government-Furnished Property
- 252.245-7002, Reporting Loss of Government Property
- 252.245-7004, Reporting, Reutilization, and Disposal

2. Use of the Information

- a. The information generated by the requirements of DFARS part 245 clauses is used by contractors, property administrators, and contracting officers to—
- i. Provide and manage Government property provided to contractors under Government contracts and contractors' use and management of Government property obtained under the Government contracts; and
 - ii Report, redistribute, and dispose of Government property.
- b. The new clause at DFARS 252.245-70XX strengthens the accountability and end-to-end traceability of Government property within DoD. The clause facilitates the effective and streamlined implementation of the GFP Module in accordance with Office of the Under Secretary of Defense (Acquisition and Sustainment), Defense Pricing and Contracting Memorandum, signed March 24, 2021. This memorandum can be found in the Defense Pricing and Contracting Policy Vault at https://www.acq.osd.mil/dpap/policy/policyvault/USA000413-21-DPC.pdf.
- c. The consolidated clause facilitates compliance with DoD Instruction 4161.02, Accountability and Management of Government Contract Property, which requires DoD components to use electronic transactions when transferring Government property to a contractor and upon return of property to DoD. Use of FAR clause 52.245-1, in conjunction with DFARS clause 252.245-70XX creates an electronic end-to-end process for GFP management.

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

Use of information technology tools is maximized by the proposed rule. Only one of the paper forms used to collect the required information remains, and that form (DD 1639) is not required in all cases. All other forms have electronic equivalents.

Through implementation of electronic processes, the proposed rule streamlines information collection, maximizes data reusability, and maximizes the use of the integrated acquisition environment and single sign-on capabilities. The deployment of standardized tools and transactional information technology solutions using the PIEE suite of tools is an inherent part of the end-to-end process described in paragraph 1.

4. Non-duplication

As a matter of policy, DoD reviews the FAR to determine if adequate language already exists. This request for information applies solely to DoD and does not duplicate any other requirement. Similar information is not already available to the Government.

5. Burden on Small Business

Management of Government property is not exclusive to small businesses; both large and small firms have contracts with Government property. Many small businesses already have contracts with GFP and, therefore, have existing property management systems. The use of existing electronic tools mitigates the impact to industry.

6. Less Frequent Collection

The reporting requirements described above occur on an as needed basis, e.g., upon receipt of GFP. If this information were collected less frequently, effective management of Government property would be compromised.

7. Paperwork Reduction Act Guidelines

This collection is consistent with the guidelines in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

a. Public Notice

i. A 60-day notice equivalent for the revised collection was published in the proposed rule, DFARS Case 2020-D029, for public comments in the *Federal Register* on April 27, 2023, at 88 FR 25600. Four respondents provided public comments; however only one respondent's comments were related to the reporting requirements in the rule. The respondent's comments are included below along with DoD's responses to the comments.

Comment: The respondent inquired why there is no existing requirement to report or mark items shipped-in-place.

Response: DFARS clause 252.211-7003 identifies the criteria for marking and requires reporting the receipt of all Government-furnished property. The clause does not provide an exception or exclusion for property shipped-in-place. If an item requires marking under the clause, the marking is required regardless of the shipping destination.

Comment: The respondent inquired as to why reporting of serially managed assets occurs when consumed into higher-level components as a new requirement.

Response: This is not a new requirement as the DFARS clause 252.211-7007 required the reporting of serially managed items when they are "Consumed or expended, reasonably and properly, or otherwise accounted for, in the performance of the contract as determined by the Government property administrator, including reasonable inventory adjustments." DFARS clause 252.245-70XX also requires reporting when serially-managed items of GFP are incorporated into a higher-level component, assembly, or end item.

Comment: The respondent took exception to the requirement to report the transfer of property between contracts, both in the proposed rule and DFARS clause 252.211-7007, as the transfer of property between contracts should be done by the Government through modification.

Response: FAR 45.106 and DFARS Procedures, Guidance, and Information (PGI) 245.103-71 both require a contract modification to transfer the accountability of property between contracts. FAR 45.106 states that once transferred the property becomes Government-furnished property on the new contract. Just as the Government listing the property in the contract does not show receipt of the property, the contract modification does not reflect any physical or virtual updates to the contractor records to reflect the change in accountability. The contractor reporting of transfers at DFARS 252.245-70XX(b)(ii) shows that the action required by the modification changing accountability is complete as required to enable accurate accountability of assets. This is not a change from the clause 252.211-7007.

Comment: The respondent questioned whether there is duplication between the requirements of the proposed rule (and the DFARS clause 252.211-7007) with requirements to report to the Commercial Asset Visibility System (CAV). CAV is a system used by the Department of the Navy to track assets during the repair process. The recommendation is made that reporting reparables should be removed from this case in favor of new rulemaking.

Response: The respondent's recommendation is not accepted. CAV reporting covers a specific organization's reporting requirements that include reporting not covered by the proposed rule and excludes reporting required on all Government property. FAR clause 52.245-1, at paragraphs (f)(1)(iii) and (vi), identifies that there will be contract specific reporting requirements. Including contract specific reporting requirements, however, does not eliminate DoD's need for standard reporting for all GFP. DoD has created significant efficiencies and reduced the burden on contractors by incorporating multiple legacy tools into the PIEE GFP Module. This rule advances the process of creating standard Government property reporting, and DoD continues to reduce duplicative reporting where practical.

Comment: The respondent inquired as to whether creating a standard timeframe for reporting is arbitrary and will increase the cost of compliance.

Response: The data reported on Government property is used for numerous purposes by multiple functional communities including finance, logistics, asset managers, and acquisition. These stakeholders were involved in the drafting of the proposed rule. The seven-day standard

represents a time that supports their needs for timely information and minimizes the need for contract specific reporting or timeframes. The establishment of a timeframe does not increase the volume of what will be reported or the time it takes to report each action, and therefore should have no impact on the public burden compared to the previous requirement. To minimize the impact on contractors, reporting of loss has been removed from the seven-day reporting requirement so that any action with an established timeframe in FAR clause 52.245-1 will use the existing FAR timeframe.

Comment: The respondent disagreed with the statement that DoD does not expect the proposed rule to have a significant economic impact on a substantial number of small entities within the meaning of the Regulatory Flexibility Act, 5 U.S.C. 601, et seq., because the rule is not creating any new requirements for contractors.

Response: The items identified as new requirements by the respondent in prior comments are requirements in the existing contract clauses. Many of those requirements have been simplified or reduced in the final rule to reduce the impact on contractors. The improvements in automation and the standardization of business processes in this rule are expected to substantially reduce the burden on industry.

Comment: The respondent inquired if the Department should provide instruction on reporting of embedded items removed during repair.

Response: Reporting of embedded items during repair is based on the requirements of the contract and the GFP attachment. The request for policy clarification will be reviewed and may be subject to future rulemaking.

ii. A 30-day notice for the collection was published in the *Federal Register* on December 5, 2023, at 88 FR 84308.

b. Consultation

For the purpose of calculating respondent burden, DoD subject matter experts were contacted to obtain current data. No additional consultation, apart from soliciting public comments through the *Federal Register*, was conducted for this submission.

9. Gifts or Payment

No payments or gifts will be provided to respondents as an incentive to participate in the collection, other than remuneration to contractors under the terms of their contracts.

10. Confidentiality

This information is disclosed only to the extent consistent with prudent business practices and current regulatory and statutory 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 is not required for this collection because records are not retrievable by personally identifiable information (PII). A Privacy Impact Assessment is not required for this collection because PII is not being collected electronically.

11. Sensitive Questions

There are no questions of a sensitive nature in this collection.

12. Respondent Burden and its Labor Costs

The estimated respondent burdens and labor costs associated with the information collection requirements of DFARS clause 252.245-70XX are summarized in the tables below. The labor rate used is \$51.13 per hour based on the Office of Personnel Management (OPM) 2023 basic hourly rate (for Rest of the U.S. with locality pay) of \$37.53 for a GS 11, Step 5 plus \$13.60 for the 36.25% full fringe benefit rate from OMB Memorandum M-08-13.

a. <u>DFARS 252.245-70XX(b)(1)</u>. The following is a summary of the estimated annual burden for contractors to report GFP receipt or shipment into the GFP module in the PIEE.

1. Estimation of Respondent Burden

The estimates for reporting GFP were developed using definitive information on reporting by contractors for fiscal year (FY) 2019 through FY 2021. The requirement for reporting of Government property was previously established under OMB Control Numbers 0704-0246 (DD Form 1348-1A) and 0704-0398 (DFARS clause 252.211-7007). The reporting requirement still exists under the new consolidated clause; however, this rule analyzes the reporting activities as one effort and updates the values for each component of the burden. Therefore, clearance of the burden under 0704-0398 is no longer required.

The number of responses for the reporting activities is updated to 450,441. This increase reflects the actual number of responses for FY 2021 for DFARS clause 252.211-7007 (416,771) and the previous estimate of the number of DD Form 1348-1As completed annually by contractors (33,670). The number of hours per response for these two requirements was previously estimated at 1.25 (0.25 hours for DFARS clause 252.211-7007 and 1 hour for DD Form 1348-1A). As a result of the change in how the information is collected, with improved electronic reporting and the migration of the DD Form 1348-1A equivalent data requirements to the GFP Module, the estimated number of hours per response is reduced to 0.1 hour for both activities combined.

Estimation of Respondent Burden: DFARS 252.245-70XX(b)(1)		
Number of respondents 3,503		
Number of responses per respondent	128.6	
Number of total annual responses	450,441	
Hours per response	0.1	

Annual respondent burden hours (Total annual responses * hours per	45,044
response)	45,044

2. Labor Cost of Respondent Burden

The fully burdened rate per hour is \$51.13, based on the OPM GS-11, step 5, base hourly rate for 2023 (\$37.53) plus the 36.25% civilian personnel full fringe benefit rate from OMB Memo M-08-13, equals \$51.13. The OPM rate used includes locality pay area for the rest of the U.S.

Labor Cost of Respondent Burden: 252.245-70XX(b)(1)	
Number of total annual responses	450,441
Hours per response	0.1
Cost per hour (hourly wage)	\$51.13
Labor burden per response (Hours per response * hourly wage)	\$5.11
Annual Labor Burden (Total annual responses * hours per response * hourly wage)	\$2,303,104.83

b. <u>DFARS 252.245-70XX(k)(2)</u>. The following is a summary of the estimated annual burden for contractors to secure from scrap buyers a DD Form 1639, Scrap Warranty.

1. Estimation of Respondent Burden

The estimates for the scrap warranty were developed using definitive information on reporting by contractors for FY 2019 through FY 2021. The requirement for DD Form 1639 is unchanged as a result of the proposed rule; therefore, the number of hours per response remains 0.25 hour based upon input from Defense Contract Management Agency (DCMA) subject matter experts. The number of responses is updated to 3,364 based upon DCMA estimates for FY 2021 submittals. The respondents are the same as and not additive to those calculated in 12.a. above.

Estimation of Respondent Burden: DFARS 252.245-70XX(k)(2)		
Number of respondents	1,030	
Number of responses per respondent	3.27	
Number of total annual responses	3,364	
Hours per response	0.25	
Annual respondent burden hours (Total annual responses * hours per response)	841	

2. <u>Labor Cost of Respondent Burden</u>

The fully burdened rate per hour is \$51.13, based on the OPM GS-11, step 5, base hourly rate for 2023 (\$37.53) plus the 36.25% civilian personnel full fringe benefit rate from OMB Memo M-08-13 (\$51.13). The OPM rate used includes locality pay area for the rest of the U.S.

Labor Cost of Respondent Burden: 252.245-70XX(k)(2)	
Number of total annual responses	3,364
Hours per response	0.25
Cost per hour (hourly wage)	\$51.13
Labor burden per response (Hours per response * hourly wage)	\$12.78
Annual Labor Burden (Total annual responses * hours per response * hourly wage)	\$43,000.33

c. <u>DFARS 252.245-70XX(l)</u>. The following is a summary of the estimated annual burden for contractors to conduct sales of contractor inventory (both useable property and scrap). While sales are addressed in FAR 252.245-1, the estimates for DoD sales are not included and reported under the FAR clause.

1. Estimation of Respondent Burden

The estimates for contractor sales reflect the currently approved inventory of hours. The requirement to conduct sales of surplus contractor inventory is unchanged as a result of the proposed rule based upon input from DCMA subject matter experts. The number of sales reflect the total sales using both invitations for bids and negotiated sales. The respondents are the same as and not additive to those calculated in 12.a. above.

Estimation of Respondent Burden: DFARS 252.245-70XX(l)		
Number of respondents	190	
Number of responses per respondent	1.94	
Number of total annual responses	369	
Hours per response	2.64	
Annual respondent burden hours (Total annual responses * hours per response)	974	

2. <u>Labor Cost of Respondent Burden</u>

The fully burdened rate per hour is \$51.13, based on the OPM GS-11, step 5, base hourly rate for 2023 (\$37.53) plus the 36.25% civilian personnel full fringe benefit rate from OMB Memo M-08-13 (\$51.13). The OPM rate used includes locality pay area for the rest of the U.S.

Labor Cost of Respondent Burden: 252.245-70XX(l)
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Number of total annual responses	369
Hours per response	2.64
Cost per hour (hourly wage)	\$51.13
Labor burden per response (Hours per response * hourly wage)	\$134.98
Annual Labor Burden (Total annual responses * hours per response * hourly wage)	\$49,808.80

d. <u>DFARS 252.245-7003</u>, <u>Contractor Property Management System Administration</u>. This DFARS clause requires contractors to respond in writing to written determinations from the administrative contracting officer that identify one or more deficiencies in a contractor's property system. The estimated annual cost to the public is as follows:

1. Estimation of Respondent Burden

According to the DCMA Headquarters Property Branch, DCMA is responsible for overseeing approximately 2,150 contractor property management systems. Compliance reviews are conducted on about one third, or roughly 700, of those systems annually. Approximately 1% of those systems are disapproved on average annually, which would require a contractor response. The minimum number of 10 respondents is cited to keep the information collection for this clause active.

Estimation of Respondent Burden: DFARS 252.245-70XX(l)	
Number of respondents	10
Number of responses per respondent	1
Number of total annual responses	10
Hours per response	80
Annual respondent burden hours (Total annual responses * hours per response)	800

2. <u>Labor Cost of Respondent Burden</u>

The complexity of the work is estimated to be equivalent to that of a more senior individual at a GS-13 level. Accordingly, the fully burdened rate of \$72.88 was developed using the OPM 2023 basic hourly salary (for the rest of U.S.) of \$53.49 for a GS-13, step 5, employee, plus a burden of 36.25 percent (per OMB Circular A-76, Attachment C), which equals \$72.88.

Labor Cost of Respondent Burden: 252.245-70XX(l)	
Number of total annual responses	10
Hours per response	80

Cost per hour (hourly wage)	\$72.88
Labor burden per response (Hours per response * hourly wage)	\$5,830.40
Annual Labor Burden (Total annual responses * hours per response * hourly wage)	\$58,304.00

e. Total for OMB Control Number 0704-0246

1. Total Submission Burden

The total estimated burden hours for OMB Control Number 0704-0246 is provided in the following table:

Estimation of Respondent Burden Hours: OMB Control Number 0704-0246			
Total number of respondents	3,513		
Total number of annual responses	454,184		
Total burden hours	47,659		

2. Overall Labor Burden

The total estimated labor cost of the respondent burden for OMB Control Number 0704-0246 is provided in the following table:

Labor Cost of Respondent Burden: OMB Control Number 0704-0246				
Total number of annual responses 454,				
Annual Labor Burden	\$2,454,217.96			

13. Respondent Costs Other than Burden Hour Costs

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

14. Cost to the Federal Government

a. Labor Cost to the Federal Government

The estimated Government burden hours and labor costs associated with the information collections covered under OMB Control Number 0704-0246 are summarized in the table below. The Government burden is related to receipt, review, and analysis of the information submitted by the contractor. These estimates are based on consultations with DoD subject matter experts.

The labor rate used is \$51.13 per hour based on the OPM 2023 basic hourly rate (for the rest of the U.S.) of \$37.53 for a GS 11, Step 5 plus \$13.60 for the 36.25% full fringe benefit rate from OMB Memorandum M-08-13.

1. DFARS 252.245-70XX(b)(1)

Labor Cost to the Federal Government: 252.245-70XX(b)(1)			
Number of total annual responses	450,441		
Hours per response	0.1		
Cost per hour (hourly wage)	\$51.13		
Cost per response (Hours per response * cost per hour)	\$5.11		
Total cost (Total annual responses * cost per response)	\$2,303,104.83		

2. DFARS 252.245-70XX(k)(2)

Labor Cost to the Federal Government: 252.245-70XX(k)(2)					
Number of total annual responses					
Hours per response	0.25				
Cost per hour (hourly wage)	\$51.13				
Cost per response (Hours per response * cost per hour)	\$12.78				
Total Cost (Total annual responses * cost per response)	\$43,000.33				

3. DFARS 252.245-70XX(l)

Labor Cost to the Federal Government: 252.245-70XX(l)				
Number of total annual responses	369			
Hours per response	2.64			
Cost per hour (hourly wage)	\$51.13			
Cost per response (Hours per response * cost per hour)	\$134.98			
Total Cost (Total annual responses * cost per response)	\$49,808.80			

4. <u>DFARS 252.245-7003</u>

Labor Cost to the Federal Government: 252.245-7003			
Number of total annual responses	10		

Hours per response	80
Cost per hour (hourly wage)	\$72.88
Cost per response (Hours per response * cost per hour)	\$5,830.40
Total Cost (Total annual responses * cost per response)	\$58,304.00

5. Total for 252.245-70XX and 252.245-7003

Overall Labor Burden to the Federal Government			
Total number of annual responses	454,184		
Total Labor Burden	\$2,454,217.96		

b. <u>Total Cost to the Federal Government</u>

Total labor burden	\$2,454,217.96
Total cost to the Federal Government	\$2,454,217.96

15. Reasons for Change in Burden

The following table provides a side-by-side comparison of the previously approved burden estimates and the burden estimate for the proposed rule consolidating reporting requirements under one clause and a program change related to introduction of electronic processes. A detailed explanation of the comparison is found below the table.

Change in Burden	0704-0398 2020	0704-0557 2021	OMB Inventory for 0704-0246 2021	Subtotals – 3 PRAs	Consolidated 0704-0246 2020-D029	Difference in OMB Inventory 0704-0246	Overall Consolidated Difference 2020-D029
Respondents	256	766	1,509	2,531	3,513	2,004	982
Responses	65,000	4,290	37,484	106,774	454,184	416,700	347,410
Hours	16,250	2,145	36,459	54,854	47,659	11,200	-7,195
Total Cost	\$666,250	\$115,830	\$1,766,032	\$2,548,112	\$2,454,218	\$688,186	-\$93,894

The difference in the burdens outlined in the table above are attributable to the following:

Number of Respondents and Responses: The totals for respondents and responses are
estimated to increase based on the use of FY 2021 estimates for DD 1639 submittals and
the inclusion of actual FY 2021 data for GFP reporting. While the number of responses
has increased based on use of more recent actual data, the overall decrease in burden
hours is attributable to technological advances that reduce the time required for each
response.

- Total Hours: The decrease in hours is estimated to be primarily attributable to efficiencies gained through the electronic submission of information. The electronic process enables reuse of data when available to auto-populate other fields, thereby reducing manual inputs and time required to complete these activities.
- Total Cost: The decrease in total estimated cost is attributed to requiring fewer hours due to the electronic processes.

The three OMB Paperwork Burden clearances for the OMB Control Numbers affected by this consolidation have expiration dates in the future that will continue to be in effect until the final rule is published for DFARS Case 2020-D029. Those expiration dates are as follows:

- 0704-0398 currently cleared through 8/31/2026.
- 0704-0557 cleared through 11/30/2024.
- 0704-0246 is cleared though 10/31/2024.

Upon publication of the final rule and upon receipt of revised burden approvals for 0704-0246, OMB Control Numbers 0704-0398 and 0704-0557 will be cancelled.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

DoD does not seek approval to omit the display the expiration date of the OMB approval of the information collection.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

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