

**Federal Acquisition Regulation (FAR)
Architect-Engineer Qualifications (SF-330)
OMB Control No. 9000-0157
Justification - Part A Supporting Statement**

FAR section affected: SF 330

Overview of Information Collection:

- This justification supports clearance of an extension of the collection.

There are no program changes. The FAR requirements remain the same. This extension includes adjustments to the burden due to use of the latest Federal Procurement Data System (FPDS) data available, and the calendar year 2023 OPM GS wage rates for the rest of the United States as explained in item 15.

1. Need & Method for the Information Collection. This clearance covers the information that offerors must submit to comply with the following FAR requirements:

Standard Form (SF) 330, Architect-Engineer Qualifications. As specified in FAR 36.702(b), an architect-engineer firm must provide information about its qualifications for a specific contract when the contract amount is expected to exceed the simplified acquisition threshold (SAT).

Part I—Contract-Specific Qualifications. The information on the form is reviewed by a selection panel composed of professionals and assists the panel in selecting the most qualified architect-engineer firm to perform the specific project. The form is designed to provide a uniform method for architect-engineer firms to submit information on experience, personnel, and capabilities of the architect-engineer firm to perform along with information on the consultants they expect to collaborate with on the specific project. Part I of the SF 330 may be used when the contract amount is expected to be at or below the SAT, if the contracting officer determines that its use is appropriate.

Part II—General Qualifications. The information obtained on this form is used to determine if a firm should be solicited for architect-engineer projects. Architect-engineer firms are encouraged to update the form annually. Part II of the SF 330 is used to obtain information from an architect-engineer firm about its general professional qualifications.

The SF 330 accomplishes the following:

- Expands essential information about qualifications and experience data including:–
 - ✓ An organizational chart of all participating firms and key personnel.
 - ✓ For all key personnel, a description of their experience in 5 relevant projects.
 - ✓ A description of each example project performed by the project team (or some elements of the project team) and its relevance to the agency's proposed contract.
 - ✓ A matrix of key personnel who participated in the example projects. This matrix graphically illustrates the degree to which the proposed key personnel have worked together before on similar projects.
- Reflects current architect-engineer disciplines, experience types and technology.
- Permits limited submission length thereby reducing costs for both the architect-engineer industry and the Government. Lengthy submissions do not necessarily lead to a better decision on the best-qualified firm. The proposed SF 330 indicates that agencies may limit the length of a firm's submissions, either certain sections or the entire package. The Government's right to impose such limitations was established in case law (Coffman Specialties, Inc., B-284546. N-284546/2, 2000 U.S.Comp.Gen.LEXIS 58, May 10, 2000).

2. Use of the Information. The contracting officer uses the information provided on the SF 330 to evaluate firms to select an architect-engineer firm for a contract.

3. Use of Information Technology. Federal agencies use information technology to the maximum extent practicable. Where both the Government agency and contractors are capable of electronic interchange, the offerors may submit this information collection requirement electronically.

4. Non-duplication. These requirements are issued under the FAR, which has been developed to standardize Federal procurement practices and eliminate unnecessary duplication.

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. Collection of information on a basis other than solicitation-by-solicitation is not practical.

7. Paperwork Reduction Act Guidelines. Collection is consistent with guidelines in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments.

A. A 60-day notice was published in the *Federal Register* at 88 FR 60209, on August 31, 2023. Two identical comments were received in Regulations.gov but not posted to be publicly viewable because they were not relevant or responsive to the request for comments. The identical comments seem to be unsolicited bulk email.

B. A 30-day notice was published in the *Federal Register* at 87 FR 78037 on November 14, 2023.

9. Gifts or Payment. This collection does not provide any payment or gift to respondents, other than remuneration of contractors.

10. Privacy & Confidentiality. This information is disclosed only to the extent consistent with prudent business practices, current regulations, and statutory requirements.

11. Sensitive Questions. No sensitive questions are involved.

12. Burden Estimate.

Estimated total annual public hour and cost burden.

Subject matter experts have determined that the public reporting burden for this collection of information is estimated to average 29 hours (25 hours for Part I and 4 hours for Part II) per response, including the time for reading the instructions, gathering the facts, and answering the questions. Because of the tailoring required by the form for each project submittal, there are virtually no savings in burden hours by repeat submittals. The annual average number of new Architectural Services contracts (NAICS code 541310) awarded in FPDS between fiscal years 2020 through 2022 was 682. The annual reporting burden is estimated as follows:

Estimated number of respondents/yr.....	682
Responses per respondent.....	<u>x 4</u>
Total annual responses.....	2,728
Estimated hrs/response.....	<u>x 29</u>
Estimated annual burden hours.....	79,112
Hourly rate*.....	<u>x \$79</u>
Estimated annual cost to the public.....	\$6,249,848

* Fully burdened rate includes a 36.25 percent fringe factor (pursuant to the rate provided in OMB memorandum M-08-13 for use in public-private competition), and a 12 percent overhead rate (from A-76 revised supplemental handbook). Based on the Office of Personnel Management (OPM) 2023 General Schedule (GS) 13/step 5 salary for the rest of the United States (\$53.49 per hour) plus the fringe factor and the overhead rate, rounded to the nearest whole dollar (\$79).

13. Estimated nonrecurring costs. Not applicable.

14. Estimated cost to the Government. Time required to review information is estimated at 4 hours per response.

Estimated responses/yr.....2,728
 Reviewing time (hr)/response..... x 4
 Review time /yr..... 10,912
 Hourly rate*..... x \$79
 Estimated annual cost to the Government...\$862,048

15. Reasons for changes.

There are no program changes. The FAR requirements remain the same. This extension includes adjustments to the public and Government burden estimates based on the following:

- The estimated number of respondents and responses per year is based on the historical average of FPDS data for the three most recent fiscal years (2020 through 2022).
- The estimated cost per hour is based on use of the calendar year 2023 OPM GS wage rate for the rest of the United States.

	2020 Estimate	2023 Estimate	Change in Burden
Number of respondents	411	682	271
Total annual responses	1,644	2,728	1,084
Total burden hours	47,676	79,112	31,436
Total annual cost to public	\$3,194,292	\$6,249,848	\$3,055,556

16. Publicizing Results. Results will not be tabulated or published.

17. OMB Not to Display Approval. Approval to *not* display the expiration date for OMB approval of the information collection is not sought.

18. Exceptions to "Certification for Paperwork Reduction Submissions." There is no exception to the certification statement.

19. Surveys, Censuses, and Other Collections that Employ Statistical Methods. Statistical methods are not used in this information collection. A Part B supporting statement is not needed, or required, and therefore was not completed.

<u>FY</u>	<u>Totals</u>	
	<u>Awards</u>	<u>Unique entities</u>
2020	791	330
2021	689	299
2022	567	256
Average	682	295