

SUPPORTING STATEMENT – Part A
REQUEST FOR APPROVAL UNDER THE PAPERWORK REDUCTION ACT AND 5 CFR 1320
RIN 0412-AA87

Collection Title: Information Collection under AIDAR Clause 752.204-72, Access to USAID Facilities and USAID’s Information Systems

PART A. JUSTIFICATION

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

Federal Acquisition Regulation (FAR) [Subpart 4.13](#) (“Personal Identity Verification”) states that agencies must follow personal identity verification policies and procedures as required by [FIPS PUB 201](#) (“Personal Identity Verification of Federal Employees and Contractors”) and Office of Management and Budget (OMB) [Memorandum M-05-24](#) (“Implementation of Homeland Security Presidential Directive (HSPD) 12-Policy for a Common Identification Standard for Federal Employees and Contractors”). Agencies must include their implementation of FIPS PUB 201 and OMB Memorandum M-05-24 in solicitations and contracts that require the contractor to have routine physical access to a federally-controlled facility and/or routine access to a Federally-controlled information system.

USAID Acquisition Regulation (AIDAR) is published at [48 CFR Chapter 7](#). This final rule revises the clause at [AIDAR 752.204-72](#) (“Access to USAID Facilities and USAID’s Information Systems”) to include submission of monthly staff reports to better implement Homeland Security Presidential Directive-12 (HSPD-12) and personal identity verification (PIV) procedures at USAID.

The AIDAR clause is prescribed for use in contracts and solicitations that contain [FAR 52.204-9](#) (“Personal Identity Verification of Contractor Personnel”) and where the contract requires the contractor – including its employees, volunteers, or subcontractor employees at any tier – to have routine physical access to USAID-controlled facilities or logical access to USAID’s information systems.

Paragraph (d) of the revised AIDAR 752.204-72 clause contains the following information collection requirement:

“(d) (1) No later than the 5th day of each month, the Contractor must provide the Contracting Officer’s Representative with the following:

- (i) a list of individuals with access who were separated in the past sixty (60) calendar

days, and

(ii) a list of individuals hired in the past sixty (60) calendar days who require access under this contract.

(2) This information must be submitted even if no separations or hiring occurred during the past sixty (60) calendar days.

(3) Failure to comply with the requirements in paragraph (d)(1) may result in the suspension of all facilities and/or logical access associated with this contract.”

The clause further requires that the Contractor must return all PIV and other access credentials and remote authentication tokens to the Contracting Officer’s Representative prior to departure of the contractor personnel or upon completion or termination of the contract, whichever occurs first.

This information collection requirement that USAID is adding to the AIDAR clause is necessary to ensure the Agency’s compliance with HSPD-12 requirements and the accompanying OMB Memorandum M-05-24. Specifically, this provides for the tracking of contractor personnel and credentials, to ensure that Government contractors account for all forms of Government-provided identification issued to Government contractor personnel under a contract.

Typically, the period of performance for affected Agency awards is five years with the personnel potentially changing several times during the award. The staff reporting will allow the Agency to exercise proper oversight and timely management of the USAID PIV and access credentials assigned to contractor personnel for the duration of the award.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The information collection will be submitted by all affected contractors to the Contracting Officer’s Representative (COR). The COR will use the reports to: 1) coordinate the process of assigning PIV and other access credentials to new contractor staff, and 2) confirm that all departing contractor staff have returned PIV and other access credentials as required by the clause in the contract, or coordinate with the contractor as necessary. The COR is responsible for returning the identification cards to the Office of Security and maintaining documentation in the COR contract files to verify that the identification cards were appropriately returned, per Agency policy.

The Agency has not collected this data previously.

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. Also describe any consideration of using information technology to reduce burden.

Information technology may be applied to the maximum extent possible. The COR will establish the required format and is not prevented from accepting any staffing plans electronically – i.e., via e-mail.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

This rule implements agency specific policy and procedures to comply with FAR Subpart 4.13, FIPS PUB 201, and OMB Memorandum M-05-24. It is not duplicative of requirements in the FAR. Similar information – specifically, names of all contractor personnel with associated hiring dates and termination dates – is not otherwise available to the COR or Contracting Officer.

- 5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

The collection of the information does not have a significant impact on a substantial number of small businesses or other small entities.

- 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.**

If conducted less frequently than monthly, this information collection will not be useful for the purposes described above. Timely return of PIV and access credentials and effective oversight of this process is essential for security reasons and control of both facilities access and logical access to USAID information systems.

- 7. Explain any special circumstances for the information collection.**

The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6, with the exception of requiring respondents to report information to the agency more often than quarterly. The monthly reporting by contractors will ensure the effective oversight and increased accountability for the return of PIV and access credentials, essential to the security of facilities and USAID information systems.

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting**

comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

USAID published a [proposed rule](#) in the Federal Register titled “United States Agency for International Development Acquisition Regulation (AIDAR): Security and Information Technology Requirements ” (84 FR 10469). In this proposed rule, USAID solicited public comments on the information collection requirements and associated burden.

No comments were received on the information collection requirements outlined in the proposed rule.

USAID published a [final rule](#) in the Federal Register titled “USAID Acquisition Regulation (AIDAR): Security and Information Technology Requirements” (89 FR 19754). In this final rule, USAID referenced this information collection and noted that no comments were received.

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

No payment or gift will be provided to respondents, only remuneration to contractors under their contracts.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a Systems of Records Notice (SORN) or Privacy Impact Assessment (PIA), those should be cited and described here.

This information is disclosed only to the extent consistent with prudent business practices and current regulations.

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. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No questions of a sensitive nature are included in this information collection.

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

The estimated cost to the public is based on the estimated number of contracts that are

currently in effect at the Agency, with estimated annual salaries extrapolated from a staffing report submitted to Congress by the Agency. The staffing report provided an analysis on estimated annual salaries which was used to develop the estimated financial burden for providing USAID with a staffing report upon award of the contract, and monthly thereafter.

We extrapolated that the on-boarding list at contract award could be developed in approximately eight (8) business hours by a mid-level human resources professional. Maintenance and updating of the contractor staffing report would require minimal effort by the contractors and if maintained should be able to be updated in approximately two (2) hours per month. Based on that data, USAID developed an estimated annual cost to the respondents.

Estimated Burden: Information Collection under AIDAR 752.204-72, "Access to USAID Facilities and USAID's Information Systems"	
Number of respondents	138
Responses per respondent (annually)	12
Number of responses	1,656
Hours per response (approximately)	2
Total estimated hours annually	3,312
Cost per hour (hourly wage)	\$49.40
Annual public burden (reporting)	\$163,612

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

See table above.

14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. If there will be no costs beyond the normal labor costs for staff, state that here.

Estimation of Burden Hours: 752.204-9 - Reporting				
Contract Award List of Proposed	Number of Contractors	Contract Award: List of Employees Level of Effort (LOE)	Estimated One-time Financial Impact to	Estimated One-Time Financial Impact to All

Contract Support			Contractor (GS 11 - 13 hourly rate)	Contractors
	138	8 hours	\$49.40/rate * 8/hours = \$399.20	138 * 8/hours = 1,104 hours
				1,104/hours * \$49.40 = \$54,537.00
Monthly Report to Contracting Officer	Number of Contractors	Contractor Monthly Staffing Reports LOE	Estimated Annual Financial Impact to Contractor (GS 11 - 13)	Estimated Annual public burden (reporting)
	138	24 hours annually * 2 hours per month	\$49.40/rate * 24/hours = \$1,185.60	138 * 24/hours = 3,312 hours
				3,312/hours * \$49.40 = \$163,613.00.
Estimated Cost to the Federal Government	Estimated Number of Contracts	Estimated level of effort for USAID	Estimated Monthly Cost to the Federal Government	Estimated Annualized Cost to the Federal Government
	138 National Industrial Security Program	1 hours per month	GS-13 Step 5: \$40.10 * 138/hours = \$5,534.00	GS-13 Step 5: \$40.10 * 1,656/hours = \$66,406.00

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.

This submission requests OMB approval for a new information collection requirement in the existing AIDAR clause.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and

other actions.

This information collection will not be published.

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 topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions." (See Pg. 2 of the OMB 83-I form)

There are no exceptions to the certification statement.