

Support Statement for Information Collection
OMB Control Number, 3090-0027

Title: Contract Administration and Quality Assurance
(GSA Forms 308 & 1678)

GSAR Information Affected: GSAR 542, 546, GSA Forms 308 & 1678, GSAR clauses 552.242-70 & 552.546-70

Overview of Information Collection:

This is a request for approval of extension to an existing information collection.

This information collection applies to General Services Administration (GSA) contracts that rely on inspection for stock or special order program items.

The General Services Administration Acquisition Regulation (GSAR) clauses and GSA forms covered by this information collection include:

- GSA Form 1678, Status Report of Orders and Shipments, via GSAR clause 552.242-70, Status Report of Orders and Shipments
- GSAR clause 552.246-70, Source Inspection by Quality Approved Manufacturer
- GSA Form 308, Notice of Inspection, via GSAR clause 552.246-71, Source Inspection by Government

The following are changes of importance that have occurred since the last extension approval:

- For GSA Forms 1678 and 308: The total estimated annual public cost burden increased due to the use of updated salary data and an upwards adjustment of the amount of time to review the Form 1678. The total estimated annual public cost burden changed-
 - From: \$57,607
 - To: \$3,698,064
- For GSA Form 308*: The total estimated annual cost burden to the Government increased due to the use of updated data regarding salary. The total estimated annual cost to the Government changed-
 - From: \$11,925
 - To: \$83,642

* There is no annualized cost to the government due to individual submissions being completely automated for GSA Form 1678.

1. Need & Method for the Information Collection.

This information collection supports the monitoring, delivery, and inspection of stock and special order program items via:

GSA Form 1678, Status Report of Orders and Shipments, via GSAR clause 552.242-70, Status Report of Orders and Shipments

GSAR clause 552.242-70, Status Report of Orders and Shipments, was established to monitor the current delivery status of orders placed with supply contractors to ensure that timely corrective action could be taken by the Government in the event the contractor's performance was delinquent. The GSA Form 1678, Status Report of Orders and Shipments, was developed for supply contractors to use to meet the requirements of the clause. When GSA issues direct delivery orders, data from this form is the only notification to FAS that timely shipment has been made to customer agencies.

GSAR clause 552.246-70, Source Inspection by Quality Approved Manufacturer

GSAR clause 552.246-70, Source Inspection by Quality Approved Manufacturer, is used when source inspection is performed by a quality approved manufacturer. The use of this clause allows GSA to make the most efficient use of its inspectors by devoting them to the contracts that require inspection by the Government, to checking contracts that require inspection by the Government, to checking the contractors' inspection system, and to inspecting supplies under contracts where complaints are received regarding the quality or supplies. The clause requires contractors to document and retain inspection and testing records. This requirement should minimize the paperwork burden on contractors, while continuing to protect the Government interests.

GSA Form 308, Notice of Inspection, via GSAR clause 552.246-71, Source Inspection by Government

The GSAR clause 552.246-71, Source Inspection by Government, is used when source inspection is performed by Government personnel. Through this clause, GSA established a program providing for Government reliance on contractors to inspect supplies under certain contracts that provide for source inspection instead of relying on Government personnel to inspect supplies. For deliveries to civilian facilities, the clause requires the use of GSA Form 308. For delivery to military facilities (or computer formatted equivalents), the Department of Defence DD Form 250¹ is required.

2. Use of the Information.

The government reviews the information from the GSA Form 1678 to ensure that pending orders are shipped in a timely manner to customer agencies or to GSA warehouses. When shipment is delinquent, the requisite information is available to the government to take corrective action to prevent loss to the Government either through notice to the contractor to correct its delinquency or to recommend to the appropriate office that the contract be terminated for default. Additionally, this information is used to authorize payment of invoices.

Information contained on the GSA Form 308 is used by the government to document contract

¹ DoD is responsible for the reporting burden for Form DD 250.

quality assurance, acceptance of supplies and services, shipments, and to justify payments. The information contained on the form is essential for monitoring contract progress. Contract administration cannot be effective without this information.

3. Use of Information Technology.

GSA uses improved information technology to the maximum extent practicable. Where both the Government agency and contractors are capable of electronic interchange, the contractors may submit this information collection requirement electronically.

In order to streamline the collection of the information reported through GSA Form 1678, the General Supplies and Services program has implemented the use of two systems, Electronic Data Interchange (EDI) and Vendor Portal (VP). While both systems are available for all vendors to use, EDI is recommended for vendors who receive more than 50 orders per month and VP is recommended for vendors who receive less than 50 orders per month. The use of these systems automate all or most of the reporting requirements, significantly speed up the payment process, and eliminate the use of the GSA Form 1678 by this office.

4. Non-duplication.

GSA did not identify any duplication of information being collected. GSA's review did not identify any similar data.

5. Burden on Small Business.

The collections associated with small businesses are the minimum consistent with applicable laws, executive orders, and prudent business practices.

6. Less Frequent Collection.

Collection of the information on the GSA Form 1678 on a less frequent basis would prevent the government from taking timely action in the event of delinquent performance and, in some cases, may preclude the Government from exercising its rights in a manner that would not cause further loss to the Government.

The data reported on the GSA Form 308 is entered when a shipment is made. A copy of the form accompanies the shipment.

7. Paperwork Reduction Act Guidelines.

Not applicable. No special circumstances exist for this information collection.

8. Consultation and Public Comments.

A 60-day notice was published in the *Federal Register* at 89 FR 73418 on September 10, 2024. One comment was received.

Comment: “I have not find any type of business on the ride I am not self-employed all the income than I'd bring claimed against me is not mine I did not earn that or file that.”

Response: This comment is not relevant to the notice. Therefore, there are no changes due to this collection.

A 30-day notice published in the *Federal Register* at 89 FR 91398.

9. Gifts or Payment.

Not applicable. GSA makes no such payments or gifts to respondents under this information collection.

10. Privacy & Confidentiality.

Not applicable. GSA makes no additional assurances under this information collection beyond what is already applicable to contract information (i.e., information collected is disclosed only to the extent consistent with prudent business practices, agency regulations, and applicable statutes).

11. Sensitive Questions.

Not applicable. No sensitive questions are involved under this information collection.

12. Burden Estimate.

Aggregated Burden (Total A & B)

The total annual burden hours are estimated to be 126,300 (125,000 + 1300). The estimated annualized cost to the public is \$3,698,064 (126,300 hours*\$29.28 per hour)

Estimated Hours (Form 1678)(inclusive of responses)	125,000
Estimated Hours (Form 308)(inclusive of responses)	+ 1300
Total Estimated Hours	126,300
Avg. hourly wages*	x \$29.28
<u>Total annual recordkeeping cost</u>	<u>\$3,698,064</u>

**The estimated cost of \$29.28 per hour is based on the task being accomplished by personnel equivalent to a GS-5, Step 5 salary (Base Pay with Rest of US Locality Pay) (Salary Table 2024-RUS, Effective January 2024), with fringe of 36.25% (OMB Memo M-08-13).*

A. Status Report of Orders and Shipments (GSAR clause 552.242-70 and GSA Form 1678).

Based on data obtained from GSA’s internal contracting systems, it is estimated that 5,000,000 responses for this form are submitted each year. With the implementation of EDI/VP, the vast

majority (95%) of the responses are completely automated (those processes through EDI). The remaining 5% (250,000) of the responses (those processed through VP) each require approximately 30 minutes (.50 hours) per response for a total of 125,000 hours.

Responses	250,000
Responses per Respondent	<u>x 1</u>
Total Annual Responses (VP)	250,000
Preparation Hours per Response	<u>x .50</u>
Estimated Hours	125,000
Average Hourly Wages*	<u>x \$29.28</u>
Total Annual Public Cost	\$3,660,000

**The estimated cost of \$29.28 per hour is based on the task being accomplished by personnel equivalent to a GS-5, Step 5 salary (Base Pay with Rest of US Locality Pay) (Salary Table 2024-RUS, Effective January 2024), with fringe of 36.25% (OMB Memo M-08-13).*

	Requested	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Change Due to Potential Violation of the PRA	Previously Approved
Annual Number of Responses for this IC	250,000	N/A	N/A	N/A	N/A	250,000
Annual IC Time Burden (Hour)	125,000	N/A	N/A	123,000	N/A	2,000
Annual IC Cost Burden (Dollars)	\$3,660,000	N/A	N/A	\$3,607,820	N/A	\$52,180

Burden per Response:

	Time Per Response	Hours	Cost Per Response
Reporting	.50	.50	\$15
Record Keeping	N/A	N/A	N/A
Third Party Disclosure	N/A	N/A	N/A
Total	.50	.50	\$15

Annual Burden:

	Annual Time Burden (Hours)	Annual Cost Burden (Dollars)
Reporting	125,000	\$3,660,000
Record Keeping	N/A	N/A
Third Party Disclosure	N/A	N/A
Total	125,000	\$3,660,000

B. Source Inspection Requirements (GSAR clause 552.246-70, 552.246-71 and GSA Form 308).

Based on data obtained from GSA's internal contracting systems, it is estimated that 2,600 responses for this form are submitted each year. Each response requires 30 minutes (.50) for a total of 1,300 hours.

Responses	2,600
Responses per Respondent	<u>x 1</u>
Total Annual Responses	2,600
Preparation Hours per Response	<u>x .50</u>
Estimated Hours	1300
Average Hourly Wages*	<u>x \$29.28</u>
Total Annual Public Cost	\$38,064

**The estimated cost of \$29.28 per hour is based on the task being accomplished by personnel equivalent to a GS-5, Step 5 salary (Base Pay with Rest of US Locality Pay) (Salary Table 2024-RUS, Effective January 2024), with fringe of 36.25% (OMB Memo M-08-13).*

	Requested	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Change Due to Potential Violation of the PRA	Previously Approved
Annual Number of Responses for this IC	2,600	N/A	N/A	N/A	N/A	2,600
Annual IC Time Burden (Hour)	1300	N/A	N/A	1,092	N/A	208
Annual IC Cost Burden (Dollars)	\$38,064	N/A	N/A	\$32,637	N/A	\$5,427

Burden per Response:

	Time Per Response	Hours	Cost Per Response
Reporting	.50	.50	\$15
Record Keeping	N/A	N/A	N/A
Third Party Disclosure	N/A	N/A	N/A
Total	.50	.50	\$15

Annual Burden:

	Annual Time Burden (Hours)	Annual Cost Burden (Dollars)
Reporting	1300	\$38,064
Record Keeping	N/A	N/A
Third Party Disclosure	N/A	N/A
Total	1300	\$38,064

13. Estimated nonrecurring costs.

Not applicable to this information collection.

14. Estimated cost to the Government.

A. Status Report of Orders and Shipments (GSAR clause 552.242-70 and GSA Form 1678).

With the implementation of EDI/VP, the review and processing of individual submissions has been completely automated, therefore there is no annualized cost to the government. Additionally, the report function of the systems allows for automated reports to be generated for the monitoring of vendor timeliness, etc.

B. Source Inspection Requirements (GSAR clause 552.246-70, 552.246-71 and GSA Form 308).

The Federal Government estimates the review of 2,600 responses. Reviewing and processing each response is estimated to take 30 minutes each (.50); thus, the burden hours to the Federal Government are estimated to be 1300 hours per year.

Number of Responses	2,600
Average Hours per Response	<u>x .50</u>
Estimated Hours per Year	1,300
Cost per Hour*	<u>x \$64.34</u>
Total Annual Government Cost	\$83,642

**The estimated cost of \$64.34 per hour is based on the task being accomplished by personnel equivalent to a GS-12, Step 5 salary (Base Pay with Rest of US Locality Pay) (Salary Table 2024-RUS, Effective January 2024), with fringe of 36.25% (OMB Memo M-08-13).*

15. Reasons for changes.

- The hourly rate (plus fringe) was updated to reflect the rates effective January 2024, as opposed to January 2021 for annual public cost burden.
- The hourly rate (plus fringe) was updated to reflect the rates effective January 2024, as opposed to January 2021 for annual cost burden to the Government.
- For Form 1678, an upwards adjustment of the time to review (non-government) from 30 seconds (.08 of an hour) to 30 minutes (.50 of an hour).

16. Publicizing Results.

Not applicable, results of this information collection will not be published. Information collected is used for internal purposes only.

17. OMB Not to Display Approval.

Not applicable, GSA is not seeking such approval for this information collection.

18. Exceptions to "Certification for Paperwork Reduction Submissions."

Not applicable, GSA has no exceptions to the certification statement.

19. Surveys, Censuses, and Other Collections that Employ Statistical Methods.

Surveys, censuses, or statistical methods are not used for this information collection.