

Support Statement for Information Collection
OMB Control Number, 3090-0248

Electronic Data Interchange (EDI) Information
GSAR Information Affected: Solicitation Provisions and Contract Clauses; 552.216-72,
Placement of Orders; and 552.216-73, Ordering Information

Overview of Information Collection:

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

This information collection applies to General Services Administration (GSA) contracts with delivery and task orders where there is a requirement for Offerors to receive electronic orders through computer-to-computer Electronic Data Interchange (EDI).

The General Services Administration Acquisition Regulation (GSAR) sections covered by this information collection include:

- 552.216-72, Placement of Orders
- 552.216-73, Ordering Information

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

- The total estimated annual public cost burden increased due to the use of updated salary data and upwards adjustments of the time to complete. The total estimated annual public cost burden changed-
 - From: \$150,223
 - To: \$337,130
- The total estimated annual cost burden to the Government increased due to the use of updated data regarding salary and upwards adjustments of the time to review. The total estimated annual cost to the Government changed-
 - From: \$150,233
 - To: \$337,130

1. Need & Method for the Information Collection.

For many years, the General Services Administration (GSA), Federal Acquisition Service (FAS), has had the capability to place orders under contracts electronically using Electronic Data Interchange (EDI), XML, json, and internally developed applications. The GSAR has prescribed in 516.506 the use of GSAR clauses 552.216-72, Placement of Orders, and 552.216-73, Ordering Information, in solicitations and contracts for contracts to provide requirements for Offerors to receive electronic orders.

To accomplish EDI, XML and json, a company enters into a Trading Partner Agreement (TPA) with FAS. The use of electronic means furthers congressional and executive branch policies that Federal agencies provide leadership in advancing environmental objectives through technology and the expanded use of electronic commerce.

2. Use of the Information.

Establishing TPAs with contractors ensures compatibility of Government and contractor equipment and that each party understands the responsibility associated with placing orders using the electronic methods.

3. Use of Information Technology.

GSA continues to improve and expand the use of information technology to the maximum extent practicable. Where both the Government and the contractor are capable of electronic interchange, these information collection requirements may be submitted electronically.

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. The nature of the reporting requirements precludes reducing the information collection burden for small businesses.

6. Less Frequent Collection.

Unless a contractor establishes a TPA with FAS to use the EDI procedures, it will not receive delivery orders through this manner. Otherwise, orders will be mailed to the contractor.

7. Paperwork Reduction Act Guidelines.

Not applicable, no special circumstances exist for this information collection.

8. Consultation and Public Comments.

A 60-day notice published in the *Federal Register* at 89 FR 76831 on September 19, 2024. No comments were received. A 30-day notice published in the *Federal Register* at 89 FR 92689 on November 22, 2024.

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.

GSA based the estimated burden on information obtained from subject matter experts familiar with the approximate number of vendors electing to receive orders via computer-to-computer Electronic Data Interchange or other electronic means, and the range of processing times, depending on the complexity of the contract. The burden reflected is the burden of submitting the required information.

The burden addressed in this information collection requirement is the burden of submitting the required information.

Number of respondents:	18,590
Responses per respondent:	<u>x 1</u>
Number of responses:	18,590
Avg. hours per response:	<u>x .50</u>
Estimated burden hours:	9,295
Estimated Cost Per Hour: (\$26.62 + 36.25%)	<u>x \$36.27*</u>
Total Estimated Annual Cost Burden:	\$337,130

*The estimated cost of \$36.27 per hour is based on the task being accomplished by personnel equivalent to a GS-7, 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	Program Change Due to Agency	Change Due to Adjustment in	Change Due to Potential	Previously Approved
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		Statute	Discretion	Agency Estimate	Annual Violation of the PRA	
Annual Number of Responses for this IC	18590	N/A	N/A	0	N/A	18590
Annual IC Time Burden (Hour)	9295	N/A	N/A	0	N/A	4648
Annual IC Cost Burden (Dollars)	\$337,130	N/A	N/A	\$186,907	N/A	\$150,223

Burden per Response:

	Time Per Response	Hours	Cost Per Response
Reporting	.50	.50	\$18
Record Keeping	N/A	N/A	N/A
Third Party Disclosure	N/A	N/A	N/A
Total	.50	.50	\$18

Annual Burden:

	Annual Time Burden (Hours)	Annual Cost Burden (Dollars)
Reporting	18,590	\$337,130
Record Keeping	N/A	N/A
Third Party Disclosure	N/A	N/A
Total	18,590	\$337,130

13. Estimated nonrecurring costs.

Not applicable to this information collection.

14. Estimated cost to the Government.

The annualized cost to the Federal Government is estimated as follows:

Number of responses	18,590
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Review time per response	<u>x 0.50</u>
Estimated Hours	9,295
Cost per hour*	<u>x \$36.27*</u>
Total annual Government cost	\$337,130

*The estimated cost of \$36.27 per hour is based on the task being accomplished by personnel equivalent to a GS-7, 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.
- An upwards adjustment of the time to review from 15 minutes (.25 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.