
Supporting Statement for Supplemental Labor Management Office (SLMO) Driver Attestation

Part A: Justification

OMB No. 1910-NEW

BPA F 5200.02e, Motor Vehicle Driver Attestation for Contract Personnel

January 2025

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Introduction

Provide a brief introduction of the Information Collection Request. Include the purpose of this collection, note the publication of the 60-Day Federal Register Notice, and provide the list of forms within this collection.

BPA is submitting to the Office of Management and Budget (OMB) a proposal for collection of information pursuant to the Paperwork Reduction Act of 1995 (PRA). The purpose of the Information Collection Request is to collect information from BPA contractors at Bonneville Power Administration (BPA) sites pertaining to authorization to operate BPA owned/leased/provided motor vehicles by contracted labor personnel. The proposed collection will allow BPA to gather information from contracting entities to ensure that safety and fiscal requirements are being met.

The Department published a 60-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on July 2, 2024, volume 89, number 127, and page 54807. The notice described the collection and invited interested parties to submit comments or recommendations regarding the collection. One comment was received, but the content was unrelated to the notice.

The Department published a 30-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on November 27, 2024, volume 89, number 229, and page 93568. No comments were received.

This collection requires OMB approval under the PRA because the form gathers information from contract employees. This new collection contains one collection instrument. The relevant instrument for this collection is the following form:

BPA F 5200.02e, Motor Vehicle Driver Attestation for Contract Personnel: **Form used to identify requirements for the use of government vehicles and collect attestation from contract personnel and contract company.**

A.1. Legal Justification

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 information collection.

BPA is a power marketing administration, a federal nonprofit agency based in the Pacific Northwest. Although BPA is part of the U.S. Department of Energy, it is self-funding and covers its costs by selling its products and services. BPA markets wholesale electrical power from 31 federal hydro-electric dams in the Columbia River Basin, one non-federal nuclear plant and several other small non-federal power plants. The U.S. Army Corps of Engineers and the Bureau of Reclamation own and operate the federal dams. BPA is responsible for marketing about one-third of the electric power used in the Northwest.

BPA also operates and maintains about three-fourths of the high-voltage transmission lines in its service territory. BPA's service territory includes Idaho, Oregon, Washington, western Montana and small parts of eastern Montana, California, Nevada, Utah, and Wyoming.

As part of its responsibilities, BPA promotes energy efficiency, renewable resources, and new technologies. The agency also funds regional efforts to protect and rebuild fish and wildlife populations affected by hydroelectric power development in the Columbia River Basin.

BPA derives its contracting authority from several acts. The Bonneville Project Act, particularly Sections 2(f) and 8 (16 U.S.C. § 832a.), grants authority to the Bonneville Administrator to contract for supplies and services. The Federal Columbia River Transmission System Act of 1974, particularly Section 11(b) (16 U.S.C. § 838 et seq.), grants authority to the Bonneville Administrator to make expenditures without appropriations from Congress or limitation to fiscal year. The Pacific Northwest Electric Power Planning and Conservation Act, particularly Section 9(a) (16 U.S.C. § 839 et seq.), reaffirms the need for the special contracting authorities in Section 2(f) of the Bonneville Project Act. Establishment of the Department of Energy Act (42 U.S.C. 7101 et seq.). Additionally, (41 CFR § 101-39.300 (b)) allows for the collection of information to authorize the operation and use of Government-owned, leased, or private vehicles for official business.

A.2. Needs and Uses of Data

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 being collected in **BPA Form 5200.02e, Motor Vehicle Driver Attestation for Contract Personnel** consists of the respondent's name and attestations related to required training, the obligation to carry their license, and obligation to notify if any issues arose that would impact ability to safely and legally operate a motor vehicle. This is to ensure that motor vehicle operators are correctly licensed and able to operate a government motor vehicle. Contract workers are directed to complete the training outlined on the form, checking off each element as completed. Since the contract workers may not have network access at the time that the requirement is identified the training elements are routed to them with the form as additional documents or weblinks as appropriate. Question 1 asks the contract worker to certify that they have a valid driver's license or that a driver's license is not required for the position. The second requirement is to certify that the contract worker has reviewed the Fleet Users Guide and will comply with all rules and regulations governing the use of Government owned and leased motor vehicles and that they have read and understand the penalties for unofficial use. The third requirement certifies that they have read and understand BPA's Asset Management Instructions, Section III. The fourth requirement certifies that for GSA leased vehicles (G plated), they certify that they have read and understand the GSA Guide to Your Fleet Vehicle (also located in vehicle). The fifth requirement certifies that they have read and understand Chapter 19 of BPA's Safety Occupational Health Manual. The sixth requirement certifies that they have watched the GSA Fleet Fuel Card Training and are aware of the difference between authorized and unauthorized purchases, and that there may be serious repercussions for misuse. The seventh and final requirement for the contract worker is to certify that they will notify their employer immediately if any issues arise that would impact their ability to safely and legally operate a government motor vehicle. The next section applies to the contract worker's employer. The employer must certify that the contract worker has a valid, unexpired driver's license without restrictions that would prevent them from carrying out the duties of the assignment as outlined, and the employer will immediately notify SLMO if any issues arose that would impact their ability to

fulfill the duties of the assignment. Or the employer certifies that a drivers license is not required for the position. An hour is estimated in the burden statement to allow the contract worker to review the required training or review of required material outlined above.

A.3. Use of Technology

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.

The form is digitally filled out, electronically signed, and submitted either via DocuSign. Necessary training information including links are provided as additional attachments that are routed with the form since contract personnel may not have access to the digital links used by BPA. These attachments would be provided in a PDF format like the form or as links to public sites that contract personnel could access.

A.4. Efforts to Identify Duplication

Describe efforts to identify duplication.

This is a new collection, existing collection sources were reviewed, but none met the information requirements. To BPA's knowledge, there is no other effort to collect this information.

A.5. Provisions for Reducing Burden on Small Businesses

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

The collection applies to businesses that provide supplemental labor contract personnel to BPA. Some of those contracts require the use of a government vehicle and property rules require documentation of appropriate licensure for the use of vehicles. Additionally, some training requirements have been shown to reduce the likelihood of accidents. Thus, these training requirements apply to any users of government vehicles for BPA. The requirements outlined in this attestation are nearly identical to those made of government employees to use a government vehicle. This should not add undue burden to small businesses or other small entities.

A.6. Consequences of Less-Frequent Reporting

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.

The collection is made as required to comply with regulations related to property accountability but would not occur more frequently than once a year. If BPA did not conduct this collection, then contractors would not be able to operate government vehicles.

A.7. Compliance with 5 CFR 1320.5

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines:

(a) requiring respondents to report information to the agency more often than quarterly;

- (b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- (c) requiring respondents to submit more than an original and two copies of any document;**
- (d) requiring respondents to retain records, other than health, medical government contract, grant-in-aid, or tax records, for more than three years;**
- (e) in connection with a statistical survey, that is not designed to product valid and reliable results that can be generalized to the universe of study;**
- (f) requiring the use of statistical data classification that has not been reviewed and approved by OMB;**
- (g) that includes a pledge of confidentiality that is not supported by authority established in stature of regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- (h) requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

The information collection is conducted in a manner consistent with OMB guidelines.

A.8. Summary of Consultations Outside of the Agency

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 5CFR 320.8(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 in response to the comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside DOE to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or report.

The Department published a 60-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on July 2, 2024, (volume 89, number 127, and page number 54807). One comment was received, but the content of the response was unrelated to the notice.

The Department published a 30-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on November 27, 2024, volume 89, number 229, and page 93568. No comments were received.

No other efforts were made to consult with persons outside DOE.

A.9. Payments or Gifts to Respondents

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

Respondents will not receive any payments or gifts.

A.10. Provisions for Protection of Information

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

BPA provides notice that the proposed collection of information in this program will be part of a system of records covered by the Privacy Act and may not be available under the Freedom of Information Act. The System of Records associated with this collection is DOE-23 Property Accountability System. Collection instruments requiring a Privacy Act statement contain that statement.

A.11. Justification for Sensitive Questions

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 DOE 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 asked of respondents.

A.12A. Estimate of Respondent Burden Hours

Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, DOE should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample fewer than 10 potential respondents is desirable.

The totals in the table below are averages provided by BPA's Supplemental Labor Management Office staff. Burden hours were estimated based upon staff timing while reviewing instructions and filling out the collection instrument.

Table A1. Estimated Respondent Hour Burden

Form Number/Title (and/or other Collection Instrument name)	Type of Respondents	Number of Respondents	Annual Number of Responses	Burden Hours Per Response	Annual Burden Hours	Annual Reporting Frequency
BPA F 5200.02e - MOTOR VEHICLE DRIVER ATTESTATION FOR CONTRACT PERSONNEL	contractors	250	250	1	250	1
TOTAL		250	250		250	

A.12B. Estimate of Annual Cost to Respondent for Burden Hours

Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under ‘Annual Cost to Federal Government’.

Annual cost to the public is estimated to be \$17,380 based on an average of \$69.52/hour using BLS data [Table 2. Civilian workers by occupational and industry group - 2024 Q04 Results \(bls.gov\)](#) using Professional and Related Management occupational group fully burdened compensation and 250 annual burden hours for the responses. Capital and startup costs do not apply to these questionnaires.

Table A2. Estimated Respondent Cost Burden

Type of Respondents	Total Annual Burden Hours	Hourly Wage Rate	Total Respondent Costs
Contractors	250	69.52	\$17,380
TOTAL	250		\$17,380

A.13. Other Estimated Annual Cost to Respondents

Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

Other than those described above, BPA does not anticipate any additional annual cost burden to respondents. There will be no ongoing operation or maintenance costs for respondents.

A.14. Annual Cost to the Federal Government

Provide estimates of annualized cost to the Federal government.

The estimated annual budget for the Supplemental Labor Management Office that processes this information collection is \$3,469.44 annually. This includes estimated federal burden for BPA personnel processing the completed forms, which is based on the total number of hours it would take to complete review and verification of information. The estimate for a fully burdened, General Schedule (GS) 12 full time equivalent (FTE) with locality pay is approximately \$52.03/hour multiplied by 1.6 to establish a fully burdened rate of \$83.25 (based on the OPM salary tables for 2025 [Pay & Leave : Salaries & Wages - OPM.gov](#)). BPA approximates 10 minutes (0.1667 hours) to review each form. With an anticipated 250 forms submitted annually, this amounts to 41.675 burden hours, resulting in a total annualized cost of \$3,469.44

A.15. Reasons for Changes in Burden

Explain the reasons for any program changes or adjustments reported in Items 13 (or 14) of OMB Form 83-I.

This is a new collection, therefore there are no changes or adjustments reported.

A.16. Collection, Tabulation, and Publication Plans

For collections whose results will be published, outline the plans for tabulation and publication.

This information collection will not be published.

A.17. OMB Number and Expiration Date

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

BPA will display the OMB Control Number and expiration date on all collection vehicles.

A.18. Certification Statement

Explain each exception to the certification statement identified in Item 19 of OMB Form 83-I.

There are no exceptions to the certification statement.