

General Services Administration  
Modifications (Multiple Award Schedules)  
OMB Control Number, 3090-0302  
Justification – Part A Supporting Statement

Overview of Information Collection:

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

This information collection applies to contractors who have a General Services Administration (GSA) Multiple Award Schedule (MAS) (also known as Federal Supply Schedule (FSS) contract.

The information being collected is required by General Services Administration Acquisition Regulation (GSAR) clause 552.238-82, Modifications (Federal Supply Schedule), including its Alternate I and Alternate II. The GSAR clause establishes requirements how a contractor is to submit a request for certain types of contract modification.

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

- The total estimated response per year decreased due to the use of updated data. The total estimated responses changed-
  - From: 14,200
  - To: 8,000
- The total estimated annual public time burden (hours) decreased due to the use of updated data. The total estimated annual public time burden (hours) changed-
  - From: 49,700
  - To: 28,000
- The total estimated annual time burden (hours) to the Government decreased due to the use of updated data. The total estimated annual cost to the Government changed-
  - From: 28,400
  - To: 16,000

1. Need & Method for the Information Collection.

The information being collected is required by General Services Administration Acquisition Regulation (GSAR) clause 552.238-82, Modifications (Federal Supply Schedule). The clause requires contractors who have a MAS contract to request a contract modification by submitting information to the contracting officer. At a minimum, each contract modification request covered by this clause is to include an explanation for the request and supporting information. The clause has an Alternate I and Alternate II as well.

The basic clause applies to MAS contracts that are not subject to transactional data reporting

and covers the following types of requests for contract modification: additional items/additional SINs, deletions, and price reductions. Alternate I is pretty much the same as the basic clause with exception to paragraph (e) being revised to reflect a MAS contractor accepting eMod. Alternate II applies to MAS contracts subject to transactional data reporting and covers the following types of requests for contract modification: additional items/additional SINs and deletions.

The information collected is submitted electronically (to the maximum extent possible) and is a part of a contractor's request for a contract modification under the aforementioned GSAR clause.

2. Use of the Information.

The information collected is used by a contracting officer to evaluate and process requests for contract modifications submitted in accordance with the GSAR clause.

The information collected is not used by other Federal agencies.

3. Use of Information Technology.

GSA uses information technology to the maximum extent practicable for this information collection. Contractors are required to submit these requests electronically, unless for some reason they are incapable of doing so.

4. Non-Duplication.

GSA did not identify any duplication of information being collected under this information collection. The contractor submitting the request for contract modification determines the specific information necessary to support their request.

This information is not collected elsewhere and it could not otherwise be obtained. The information collected is provided by the contractor for purposes of supporting their request for contract modification. The information provided by the contractor is specific to each request.

Any similar information that may already be available to GSA cannot be used or modified to be used for the purposes described as only the contractor submitting the request can determine the specific information needed to support their request. The contracting officer evaluates the request (which relies upon information provided by the contractor) and then makes a determination on how to proceed (e.g., accept the request and proceed with modifying the contract, deny the request).

5. Burden on Small Business.

The burden applies equally to both other than small businesses and small businesses that are doing that have a MAS contract. The submission of a request for contract modification under the GSAR clause is a decision made by the contractor not the Government. The degree and extent of

information submitted by the contractor is also a decision made by the contractor. The purpose of the information is to support their request for contract modification in accordance with the terms and condition of the GSAR clause.

6. Less Frequent Collection.

The frequency of and need for this collection is based on decisions made by the contractor, not the Government. The information is provided by the contractor and specific to their request for contract modification under the GSAR clause.

If GSA could not obtain this information, GSA would not be able to efficiently and effectively process these types of requests. For example, one type of request for modification under the GSAR clause is the contractor requesting deletion of an item/items from their contract. If the Government did not have this type of information then the Government would not be able to process the modification.

The inability to process these types of modification requests would also hinder the GSA MAS program. For example, if contractors were prevented from adding items/SIN to their contract then the MAS program would not be able to maintain products, services, and solutions available to meet Federal agencies' missions and programmatic needs. Also, vendors would also likely not elect to hold a MAS contract if they could not ensure the accuracy and currency of the products, services, and solutions they offer.

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 90 FR 19204 on May 6, 2025. Comments were received from one respondent; however, they did not change the estimate of the burden.

*Comment on the Burden Estimate:* The respondent stated that "The actual time to prepare a modification including all necessary documents is significantly higher." However the respondent didn't provide any data to support this statement or propose an alternate estimate.

*Response:* The need for a modification and the information provided by the contractor via eMod is specific to their request for contract modification under the GSAR clause. The information collection burden estimate reflects an average burden concerning the types of the modifications covered by the clause. As a result, the Government believes its estimate of the burden is reasonable.

*Comments on the Clause Requirements:* The respondent provided information about each of the clause requirements (e.g., provided information about paragraph (b)(i) of the clause 552.238-82.

*Response:* GSA appreciates this helpful information. Additionally, the information reaffirms the value and use of eMod for submitting these types of modification requests.

A 30-day notice was published in the *Federal Register* at 90 FR 31666 on July 15, 2025.

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).

This information collection does not require collection of “personally identifiable information.”

GSA uses information technology to the maximum extent practicable.

11. Sensitive Questions.

Not applicable, no sensitive questions are involved under this information collection.

12. Burden Estimate.

The annual estimated total burden hours resulting from this information collection is 28,000 hours. This is based on the following calculation:

Estimated # of respondents (year)	8,000
Estimated # of submissions per respondent	<u>x 1</u>
Estimated total # of submissions (year)	8,000
Estimated hours per request	<u>x 3.5</u>
Estimated total burden hours	28,000

● Changes Due to Adjustment in Agency Estimate:

An updated estimated # of respondents (year) was used. This updated number is calculated by adding the total number of the types of contract modification requests covered by this clause for fiscal years 2022, 2023, and 2024 and then dividing that number by 3. The prior agency estimate used data for fiscal years 2019, 2020, and 2021.

	Requested	Change Due to	Change Due to	Change Due to	Change Due to	Previously Approved
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		New Statute	Agency Discretion	Adjustment in Agency Estimate	Potential Violation of the PRA	
Annual Number of Responses for this IC	8,000	N/A	N/A	(6,200)	N/A	14,200
Annual IC Time Burden (Hour)	28,000	N/A	N/A	(21,700)	N/A	49,700
Annual IC Cost Burden (Dollars)	\$1,836,160	N/A	N/A	(\$1,082,225)	N/A	\$2,918,384

Burden per Response:

	Time Per Response (Hours)	Cost Per Response (Dollars)
Reporting	3.5	\$230
Record Keeping	(included in the above)	(included in the above)
Third Party Disclosure	N/A	N/A
Total	3.5	\$230

Annual Burden:

	Annual Time Burden (Hours)	Annual Cost Burden (Dollars)
Reporting	28,000	\$1,836,160
Record Keeping	(included in the above)	(included in the above)
Third Party Disclosure	N/A	N/A
Total	28,000	\$1,836,160

The estimated total annual cost burden to the public is \$1,836,160. This estimate is based on the following calculation:

Estimated # of respondents (year)	8,000
Estimated # of submissions per respondent	x <u>1</u>
Estimated total # of submissions (year)	8,000
Estimated hours per request	x <u>3.5</u>
Estimated total burden hours	28,000

Estimated cost per hour*	<u>\$65.58</u>
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Estimated total annual cost burden to the public	\$1,836,160
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The estimated cost per submission is approximately \$230.00. This number was calculated by dividing the estimated annual cost by the estimated # of submissions (year).

\*The estimated cost per hour is based on the Office of Personnel Management (OPM) GS-12, Step 5 salary of \$48.13 per hour (see OPM Salary Table 2025-RUS, Effective January 2025), plus a fringe factor of 36.25% (\$17.45) (see OMB Memo M-08-13 for use in public-private competition), which results in an hourly rate of \$65.58.

13. Estimated nonrecurring costs.

Not applicable to this information collection.

14. Estimated cost to the Government.

The estimated total annual cost to the Government is \$1,049,234. This estimate is based on the following calculation:

Estimated total # of submissions (year)	8,000
Estimated review time per submission (hours)	<u>x 2</u>
Estimated total review time per year (hours)	16,000
 Estimated cost per hour*	 <u>x \$65.58</u>
Total estimated annual cost to the Government	\$1,049,234

\*The estimated cost per hour is based on the Office of Personnel Management (OPM) GS-12, Step 5 salary of \$48.13 per hour (see OPM Salary Table 2025-RUS, Effective January 2025), plus a fringe factor of 36.25% (\$17.45) (see OMB Memo M-08-13 for use in public-private competition), which results in an hourly rate of \$65.58.

15. Reasons for changes.

For Item 12, an updated estimated # of submissions per year was used. This number is calculated by adding the total number of modifications processed under this clause over a three fiscal year span and then dividing that number by 3. This number was then rounded up to the nearest whole number to account for the possibility of a request being denied. The change in this number can be attributed to being able to obtain updated data. Specifically, the update data reflects fiscal years 2022, 2023, and 2024, whereas the prior data reflected fiscal years 2019, 2020, and 2021.

For Item 14, an updated estimated # of respondents (year) was used. This number is calculated by using the same method used to determine the estimated # of submission per year for Item 12.

For Items 12 & 14, an updated estimated cost per hour was used. This number is based on the Office of Personnel Management (OPM) GS-12, Step 5 salary of \$48.13 per hour (see OPM Salary Table 2025-RUS, Effective January 2025), plus a fringe factor of 36.25% (\$17.45) (see OMB Memo M-08-13 for use in public-private competition). The change can be attributed to using current data (i.e., the previous extension used OPM salary data from 2022).

16. Publicizing Results.

Not applicable, results of this information collection will not be published. Information collected is used for internal purposes only, specifically for the administration of GSA FSS contracts.

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.

Not applicable, statistical methods are not used for this information collection.