

Supporting Statement for Information Collection
OMB Control Number 3090-0308

Title: Construction-Manager-as-Constructor Contracting
GSAR Section Affected: 552.236-72

Overview of Information Collection.

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

There are no significant changes since the last approval of this information collection. Updates to previous estimates (rounded to the nearest thousand) include:

- The total estimated annual cost burden to the public increased due to the use of updated data. The total estimated annual public cost burden changed-
 - From: \$65,355
 - To: \$158,610
- The total estimated annual cost burden to the Government increased due to the use of updated data. The total estimated annual cost to the Government changed-
 - From: \$130,711
 - To: \$158,610
- Previous reference to the GSA Form 2437 has been removed as this form is not directly covered by this ICR and it does not impact the burden estimate.

1. Need and Method for the Information Collection.

The collected information is required by GSAR clause 552.236-72, Submittals. The GSAR clause requires the Contractor to prepare and submit all submittals as specified in the contract or requested by the Contracting Officer in solicitations and contracts if construction, dismantling, demolition, or removal of improvements is contemplated. Alternate I of the clause will be used when a design-build project delivery method will be followed.

- *Submittals.* Submittals may include safety plans, schedules, shop drawings, coordination drawings, samples, calculations, product information, or mockups.
- *Shop Drawings.* Shop drawings may include fabrication, erection and setting drawings, manufacturers' scale drawings, wiring and control diagrams, cuts or entire catalogs, pamphlets, descriptive literature, and performance and test data.
- *Additional information.* Unless otherwise provided in this contract, or otherwise directed by the Contracting Officer, submittals shall be submitted to the Contracting Officer:
 - (i) The Contractor shall be entitled to receive notice of action on submittals within a reasonable time, given the volume or complexity of the submittals and the criticality of the affected activities to substantial completion as may be indicated in the project schedule
 - (ii) The Contractor shall not proceed with construction work or procure products

or materials described or shown in submittals until the submittal is reviewed. Any work or activity undertaken prior to review shall be at the Contractor's risk. Should the Contracting Officer subsequently determine that the work or activity does not comply with the contract, the Contractor shall be responsible for all cost and time required to comply with the Contracting Officer's determination. The Contracting Officer shall have the right to order the Contractor to cease execution of work for which submittals have not been reviewed. The Government shall not be liable for any cost or delay incurred by the Contractor attributable to the proper exercise of this right.

See Item 6 below for the consequences if the information collection is not conducted or conducted less frequently.

2. Use of the Information.

The information collected is used for internal administration of contracts.

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 under this information collection. Each submittal is unique, and there is no similar data, and no duplication exists. The Contractor providing the submittals determines the specific information necessary to support their request.

5. Burden on Small Business.

The burden applies equally to small businesses that opt to do business with GSA. This information collected is necessary to meet the specific objectives of the contract.

6. Less Frequent Collection.

The information is provided by the Contractor and specific to their required contract submittal documents under the aforementioned GSAR clause. Not collecting this information or collecting this information less frequently would impede contracting officers from performing their administrative functions efficiently and effectively.

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 21931 on May 22, 2025. No

comments were received. A 30-day notice was published in the *Federal Register* at 90 FR 21931 on May 22, 2025. No comments were received.

9. Gifts or Payment.

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

10. Privacy and 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.

Based on FPDS-NG data for FY 2024, it is estimated that 9,945 construction contracts are awarded each year. Of these construction contracts, it is estimated that 10% will be supported through contract management services. It is further estimated that an average of 5 change orders per contract per year will be required. Given the detail required in these proposals identified on the form, an estimate of 30 minutes (0.50 hours) per change was assumed for the response burden.

The annual estimated total burden hours resulting from this information collection is 2,488 hours. This is based on the following:

Estimated # of respondents (year)	995
Estimated # of submissions per respondent	<u>x 5</u>
Estimated total # of submissions (year)	4,975
Estimated hours per request	<u>x 0.50</u>
Estimated total burden hours	2,488
Estimated cost per hour*	<u>\$63.75</u>
Estimated total annual cost burden to the public	\$158,610

The estimated cost per submission is approximately \$31.88. This number was calculated by multiplying the estimated cost per hour (\$63.75) by estimated hours per submission (i.e. .50).

*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-GS, Effective January 2025), plus a fringe factor of 36.25% (\$15.62) (see OMB Memo M-08-13 for use in public-private competition), which results in an hourly rate of \$63.75.

	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	4,975	Not applicable	Not applicable	523	Not applicable	4,452
Annual IC Time Burden (Hour)	2,488	Not applicable	Not applicable	1,375	Not applicable	1,113
Annual IC Cost Burden (Dollars)	\$158,610	Not applicable	Not applicable	\$93,255	Not applicable	\$65,355

Burden per Response:

	Time Per Response	Hours	Cost Per Response
Reporting	.50	.50	\$31.88
Record Keeping	N/A	N/A	N/A
Third Party Disclosure	N/A	N/A	N/A
Total	.50	.50	\$31.88

Annual Burden:

	Annual Time Burden (Hours)	Annual Cost Burden (Dollars)
Reporting	2,488	\$158,610
Record Keeping	N/A	N/A
Third Party Disclosure	N/A	N/A
Total	2,488	\$158,610

13. Estimated Nonrecurring Costs.

Not applicable to this information collection.

14. Estimated Cost of the Government

The estimated total cost to the Government is \$158,610. This estimate is based on the following:

Estimated total # of submissions (year)	4,975
Estimated review time per submission (hours)	<u>x .50</u>
Estimated total review time per year (hours)	2,488
Estimated cost per hour*	<u>x \$63.75</u>
Total estimated annual cost to the Government	\$158,610

**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 20225-GS, Effective January 20225), plus a fringe factor of 36.25% (\$15.62) (see OMB Memo M-08-13 for use in public-private competition), which results in an hourly rate of \$63.75.

15. Reasons for Changes.

- The hourly rate was updated to reflect the rates effective January 2025, as opposed to January 2022.
- The estimated hours to complete the submission was adjusted upward from 15 minutes to 30 minutes to be in alignment with current estimates.
- The estimated hours for review was adjusted upward from 15 minutes to 30 minutes to be in alignment with current estimates.
- The estimated number of construction contracts reflected in FPDS data was updated to reflect FY2024 data, as opposed to FY2021 data.
- Previous reference to the GSA Form 2437 has been removed as this form is not directly covered by this ICR and it does not impact the burden estimate.

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 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.