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(Independent Response)

This response to the Agency Information Collection Activities; Proposals, Submissions, and Approvals: Property in the Custody of Award Recipients and Property Management System Analysis

Response Includes:

- Improving data quality through standardized metadata
- Using AI-based validation for consistency
- Leveraging automation and API submissions to reduce contractor burden
- Increasing national visibility and audit readiness for FAR Part 45 compliance

Comments on NASA Property in the Custody of Award Recipients and PMSA

I would like to thank you for giving the public an opportunity to provide comments on NASA's reinstatement with changes to its approved information collection on property in custody of award recipients. As an IT Project Manager with knowledge in Project Management, Agile workflow, data governance, workflow optimization, digital compliance systems, and enterprise project controls, I have an appreciation for the important function of this information collection for protecting federal property and ensuring FAR Part 45 compliance.

In the comments below, I will specifically respond to each of the four areas of section IV of the Request for Comments and make suggestions that will assist in supporting NASA's national mission while promoting federal-wide efficiency and modernization.

1. Necessity & Practical Usefulness of the Collection

This collection is clearly needed to fulfill NASA's duties as described:

- Forms 1018 and 1019 help ensure correct record-keeping for government property held by contractors.
- This data directly assists in NASA's ability to prepare financial statements, identify potential supply chain risks, and manage mission-related assets.
- The PMSA (Property Management System Analysis) provides assurance that contractor systems, policies and controls adhere to the FAR Part 45 requirements.

From a national level, the accurate reporting of contractor property also benefits:

- Government-wide audit preparedness
- Asset accountability across multi-agency federal programs
- Risk management related to mission-critical equipment
- Transparency for oversight bodies such as OMB and GAO

Therefore, this collection is crucial and has high practical usefulness.

2. Accuracy of NASA’s Burden Estimate

NASA’s estimated burden of 5.8 hours per response across 726 respondents (4,195 annual burden hours) appears reasonable given the current reporting structure.

However, based upon my experience developing federal reporting systems, the burden varies greatly depending on:

- The level of maturity of the contractor’s internal IT systems
- The level of standardization of data across business units
- Whether property is recorded manually or through asset management systems
- Availability of automated compliance workflows

While the estimate is acceptable, there is considerable potential to decrease this burden through modernization, which is described in sections 3 and 4 below.

3. Enhancing the Quality, Utility, and Clarity of the Information Being Collected

Below are technical recommendations to enhance clarity, utility and the overall quality of the data being collected. Each of these is new, practical and built on industry standard IT project management and data governance best-practices.

3(a). Establish a Standardized Digital Data Dictionary and Metadata Schema

NASA may establish a standardized, machine-readable metadata standard (JSON/XSD) for property reporting values.

Benefits:

- Will standardize terminology across 726 contractors
- Will increase the interpretability of property reporting values for both NASA and assisting federal agencies
- Will reduce ambiguity in classifying high value assets
- Will enable automated validation and dramatically reduce submission errors
- Will promote national-level data consistency across the federal property ecosystem

3(b). Create a clarified field guidance manual with AI-assisted examples

NASA may create a digital companion guide with:

- Examples of correctly completed fields
- AI-generated field explanations for unusual uses
- Guidance for the classification of property having multi-functionality
- Frequently mis-reported fields based on past error patterns

Benefits:

- Will increase the clarity and correctness of submissions
- Will increase the practical use of the information collected
- Will reduce the help desk load and follow up clarification requests
- Will allow contractors with differing levels of IT maturity to comply with confidence

3(c). Create real-time validation rules in the online submission portal

Examples of real-time validation rules include:

- Checks for discrepancies between prior year and current year values
- Alerts for missing mandatory fields
- Flagging outlier depreciation values
- Automatic validation against FAR Part 45 thresholds

Benefits:

- Higher data accuracy at the point of entry
- Fewer re-submissions and manual corrections
- Improved reliability of NASA's aggregate property reporting
- Support for auditability across national-level financial reporting processes

4. Minimize respondent burden using automation and technology

Below are advanced IT-based recommendations to substantially minimize burden hours while improving the quality of the data.

4(a). Offer API-based submission for contractors with mature IT systems

NASA may offer an optional secure API endpoint permitting contractors to submit Forms 1018/1019 automatically from their internal asset management systems.

How this reduces burden:

- Eliminates the need for manual re-entry for organizations managing tens of thousands of assets
- Allows for real-time submission from source systems
- Reduces human error and reconciliation time
- Promotes modernization throughout the contractor community

National-level impact:

- Contributes to federal digital transformation goals
- Streamlines asset visibility across multiple agencies
- Strengthens aerospace and scientific supply-chain integrity

4(b). Automatically pre-populate recurring annual fields

The system may automatically populate prior year values for fields that are commonly unchanged (e.g., asset categories, system descriptions, contractor identifiers).

Benefits:

- Reduce annual administrative repetition
- Lower edit times for the 726 respondents
- Increase consistency across reporting cycles

4(c). Deploy AI-based anomaly detection before submission

NASA may deploy an AI layer that scans entries for anomalies including:

- Sudden increases/decreases in asset quantity
- Unusual depreciation trends
- Inconsistencies in valuation methodologies
- Outlier data outside of established norms

Benefits:

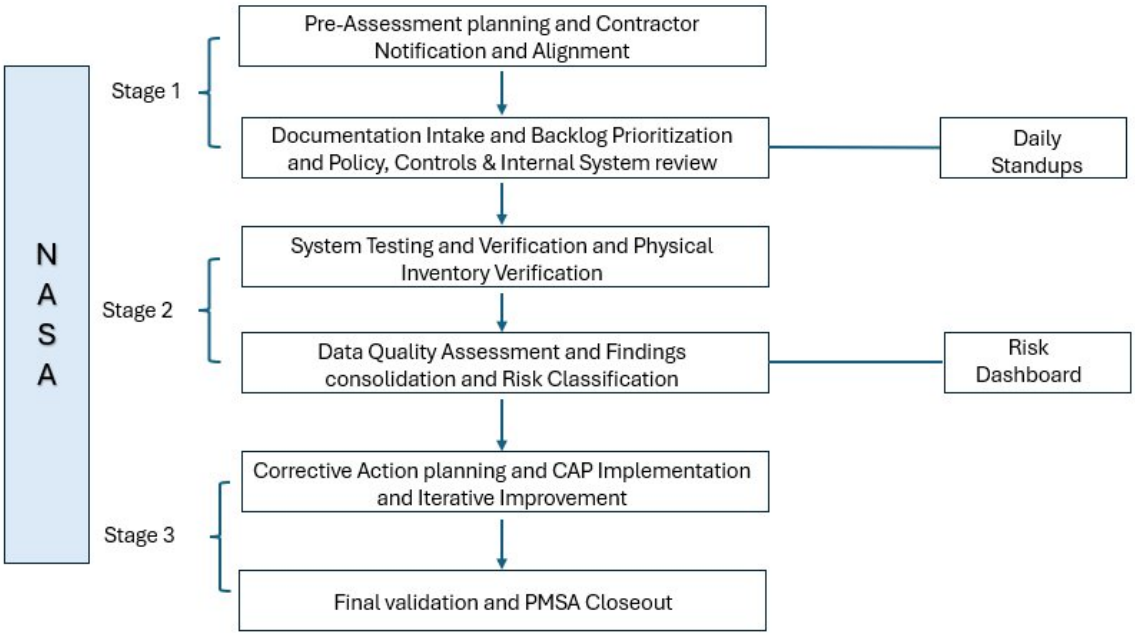
- Improve the accuracy of national-level property records
- Allow identification of risk issues earlier (theft, loss, misclassification)
- Reduce contractor burden by identifying errors ahead of time
- Create a predictive compliance environment in line with modern federal auditing practices

4(d). Develop a modernized agile-based workflow for the PMSA process

The PMSA process may be supported through a digital workflow dashboard:

- Real-time status updates of reviews
- Automated notifications when required documentation is due
- Secure upload portals for internal contractor policies
- Role-based access control for NASA analyst review

Proposed Agile based workflow for PMSA Process:



Benefits:

- Reduce back-and-forth communication
- Enable faster reviews
- Provide transparency to contractors
- Improve NASA's internal work management
- Support a scalable national property oversight framework

Conclusion: National Impact

NASA's property collection impacts operations on a nationwide basis because it governs the stewardship of federally owned property used in scientific missions, aerospace innovation, and technology development. By incorporating the recommendations presented in sections 3 and 4 based on AI, automation, agile workflows, and modern data governance.

NASA can:

- Decrease in contractor burden among all 726 respondents
- Improve the accuracy of federal property reporting
- Strengthen FAR Part 45 compliance nationwide
- Enhance audit readiness across multiple federal agencies
- Support U.S. leadership in space, science and technology innovation

These comments are made in support of NASA's mission and in accordance with government-wide digital modernization efforts.