

**Supporting Statement for Information Collection Submission**  
**OMB Control No. 3090-0246**

**Title: Packing List Clause**

GSAR Sections affected: 511.204(c) and 552.211-77

**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 for supplies, including purchases over the micro-purchase threshold. The Alternate I of the clause applies to Multiple Award Schedule (MAS) (also known as Federal Supply Schedule (FSS)) contracts.

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

511.204(c)  
552.211-77, Packing List, and its Alternate I

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

- The total estimated responses per year decreased due to the use of updated data. The total estimated responses changed-
  - From: 283,233
  - To: 100,396
- The total estimated annual public time burden (hours) decreased due to the use of updated data and correcting for errors in the prior calculation. The total estimated annual public time burden (hours) changed-
  - From: 14,162
  - To: 5,020
- The total estimated annual public cost burden (dollars) decreased due to the use of updated data and correcting for errors in the prior calculation. The total estimated annual public cost burden (dollars) changed-
  - From: \$542,363
  - To: \$125,847
- The total estimated annual time burden (hours) to the Government decreased due to the use of updated data and correcting for errors in the prior calculation. The total estimated annual cost to the Government changed-
  - From: 9,440

- To: 3,313
- The total estimated annual cost burden (dollars) to the Government decreased due to the use of updated data and correcting an error with the earlier calculation. The total estimated annual cost burden (dollars) to the Government changed-
  - From: \$361,552
  - To: 83,059

## **A. Justification**

### **1. Explain the circumstances that make the collection of information necessary.**

GSAR clause 552.211-77, Packing List, and its Alternate I, list the requirements for packing lists or other suitable shipping documents when products are being acquired. The information is used to verify order placement and to obtain shipping information (e.g., identify the products included within the shipment). Providing this type of information is a normal commercial practice. The GSAR clause and its Alternate require contractors to provide the cardholder name, telephone number and the term “Credit Card” when a Government commercial credit card is being used.

### **2. Indicate how, by whom, and for what purpose the information is to be used.**

It is a normal commercial practice to include a packing list or other suitable document that provides information about the order and items shipped (e.g., order number). In addition to information contractors would normally provide, the clause and its Alternate requires the identification of cardholder name, telephone number and the term “Credit Card” when a Government commercial credit card is being used

The additional information is used by the Government commercial credit cardholder to track products ordered and reconcile monthly statements. This information is also useful when the cardholder and the consignee are different (i.e., the recipient will use this information to notify the cardholder that they have received the product/items orders). This additional information is particularly useful and cost effective when the micro-purchase threshold has been raised in response to an emergency declaration under FAR subpart 18.2. Without this information, cardholders may experience difficulty verifying receipt of orders, especially instances where the shipment is being received by another individual, therefore delaying payment to the contractor.

### **3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection.**

Information technology is used to the maximum extent practicable. Where both the Government and contractors are capable of electronic interchange, the contractors may submit the information collection requirements electronically.

### **4. Describe efforts to identify duplication.**

The requirements placed on contractors are not duplicative of any other requirements prescribed in the Federal Acquisition Regulation (FAR) or GSAR. The nature of the information to be provided (i.e., order/ shipping information) by the contractor is specific to the order and cannot be duplicated.

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

The burden applied to small business is the minimum burden consistent with applicable laws, executive orders, regulations and prudent business practices.

**6. 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.**

Collection of the information on a basis other than by individual order for these types of procurements is not practicable. Without this information a number of issues may occur: such as the delivery may not be able to be completed; the contractor may encounter delays in payments; and customers may not be able to confirm receipt of their order.

**7. Explain any special circumstances.**

Not applicable

**8. Describe efforts to consult with persons outside the agency.**

A 60-day notice was published in the *Federal Register* at 90 FR 19205, on May 6, 2025. A single comment was received from one respondent; however, the comment did not change the estimate of the burden.

*Comment on the Need and Utility of the Information Collection:*

The respondent expressed their support for the collection and mentioned the information collected is helpful.

*Response:* The respondents' support is appreciated.

A 30-day notice was published in the *Federal Register* at 90 FR 31668 on July 15, 2025.

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

Not applicable.

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

This information is disclosed only to the extent consistent with prudent business practices and current regulations.

**11. Provide additional justification for any questions of a sensitive nature.**

Not applicable, no sensitive questions are involved under this information collection. The information requested is consistent with commercial business practices or information provided by the customer as part of their order (i.e., their name and telephone number).

**12. Provide estimates of the hour burden of the collection of information.**

The burden estimates were calculated using procurement data pulled from SAM.gov's Databank for Fiscal Years (FY) 2022, 2023, and 2024. The data was analyzed for purposes of identifying: (1) GSA awards for supplies where the method of payment was made by Governmentwide commercial purchase card, and (2) orders for supplies placed by other agencies against a GSA indefinite delivery vehicle where the method of payment was made by a Governmentwide commercial purchase card. The following table provides the results of the analysis.

	GSA	Non-GSA	Total
Estimated number of Governmentwide commercial purchase card orders for supplies that were placed by GSA or by other agencies against a GSA indefinite delivery vehicle, and orders placed by GSA not against an indefinite delivery vehicle.	26	14,316	14,342
Estimated spend on the awards identified within scope of the analysis	\$59,199	\$126,833,355	\$126,892,554
Average estimated spend per award	\$2,248	\$8,860	\$6,678

Estimated number of respondents per year.....	14,342
Estimated responses per respondent annually.....	<u>    x 7    </u>
Total annual estimated responses.....	100,396
Estimated burden hours per response.....	<u>    x 0.05    </u>
Estimated total burden hours.....	5,020
Estimated cost per hour*.....	\$29.28
Estimated total annual cost to public .....	\$146,981

The estimated total GSA awards and non-GSA orders placed against GSA indefinite delivery vehicles using a Governmentwide commercial purchase card is 14,342. The estimated total spend is \$126,892,554. This results in an average estimated spend per award of \$6,678.

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Since the information collection is based on the number of packing lists or other suitable documentation for each award and such data is not available, the Government estimated the number of packing slips using a rough yardstick of one packing slip per \$1,000 ordered value. The average estimated spend value is \$6,678, thus, the Government estimated 7 packing lists per award when rounded up to the nearest \$1,000.

The Government estimates the response time to be 3 minutes (0.05 hours) to allow for review as well as input of the required information.

\* The estimated cost of \$29.28 per hour is based on the task being accomplished by junior level contractor personnel equivalent to a GS-5, Step 5 salary (Base Pay) (Salary Table 2024-RUS, Effective January 2024), with fringe factor of 36.25% (see OMB Memo M-08-13).

	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	100,396	N/A	N/A	(182,837)	N/A	283,233
Annual IC Time Burden (Hour)	5,020	N/A	N/A	(9,142)	N/A	14,162
Annual IC Cost Burden (Dollars)	\$146,981	N/A	N/A	(\$395,410)	N/A	\$542,363

Burden per Response:

	Time Per Response	Hours	Cost Per Response
Reporting	3 min	.05	\$1.25
Record Keeping	N/A	N/A	N/A
Third Party Disclosure	N/A	N/A	N/A
Total	3 min	.05	\$1.25

Annual Burden:

	Annual Time Burden (Hours)	Annual Cost Burden (Dollars)
Reporting	5,020	\$146,981
Record Keeping	N/A	N/A
Third Party	N/A	N/A

Burden per Response:

	Time Per Response	Hours	Cost Per Response
Reporting	3 min	.05	\$1.25
Record Keeping	N/A	N/A	N/A
Third Party Disclosure	N/A	N/A	N/A
Total	3 min	.05	\$1.25

Disclosure		
Total	5,020	\$146,981

**13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.**

There is no separate capital, operation, maintenance, or service costs incurred. See Item 12 of this document for the calculation of the estimated total annual cost burden to respondents for this information collection.

**14. Provide estimates of annualized costs to the Federal Government.**

Reviewing and processing each response should take approximately 2 minutes (0.033 hours); the total number of annual responses is estimated to be 100,396 each year x .03333 hours = 3,313 hours.

Estimated reviewing time.....	.033 hrs
Estimated total responses/year.....	x 100,396
Estimated total review time/year.....	3,313 hrs
Estimate cost/hr*.....	x \$29.28
Estimate annual total government cost.....	\$97,007

\* The estimated cost of \$29.28 per hour is based on the task being accomplished by senior level contractor personnel equivalent to a GS-5, Step 5 salary (Base Pay) (Salary Table 2024-RUS, Effective January 2024), with a fringe factor of 36.25% (see OMB Memo M-08-13).

**15. Explain the reasons for any program changes or adjustments reported in Items 12 or 14.**

For Item 12, an updated estimated number of respondents per year was used. The change in this number can be attributed to using current procurement data. The previous extension used procurement data from FY21, whereas this extension uses procurement data from FY22, FY23, and FY24. The numbers for each FY were added up and an average calculated to derive some of the numbers shown in the table located in Item 12.

For Item 12, an updated estimated number of packing lists and other suitable documents for each award (i.e., the number used for the estimated responses per respondent annually) was used. The

change is attributed to using the aforementioned updated procurement data, accounting for errors found within the prior estimate, as well as rounding up to the nearest \$1,000. The yardstick of one packing slip per \$1,000 ordered value did not change.

For Item 14, an updated estimated number of responses per year was used. This change is attributed to the aforementioned changes made to Item 12.

For Items 12 and 14, an updated estimated cost per hour and fringe rate was used. The change in these numbers can be attributed to using OPM Salary Table 2024-RUS, Effective January 2024 and a fringe factor of 36.25% (see OMB Memo M-08-13). The previous extension used OPM's Salary Table 2021-RUS and used a fringe factor of 100%, which is not tied to OMB Memo M-08-13.

**16. For collections of information whose results will be published, outline plans for tabulation and publication.**

Results will not be tabulated or published.

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

Not applicable.

**18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions".**

Not applicable.

**B. Collections of Information Employing Statistical Methods.**

Statistical methods are not used in this information collection.