

SUPPORTING STATEMENT - PART A

Supporting Statement for VA Acquisition Regulation Clause 852.211-72, Technical Industry Standards OMB Control No. 2900-0586

Summary of Changes from Previously Approved Collection

- There are no revisions to the previously approved information collection (IC) instrument.
- The supporting statement is updated to the current format.
- Section 3 is revised to show that VA almost always allows this information to be submitted electronically.
- Section 10 is revised to provide additional information.
- As reflected in Section 15, there is no change in burden hours. The burden cost of this information collection increased by \$7,272 because wage rates have increased.
- The 60-day comment period ended on 11/17/2025. VA received no comments.

1. Need for the Information Collection

The Department of Veterans Affairs (VA), Office of Acquisition and Logistics (OAL) requests the Office of Management and Budget (OMB) grant an extension of a previously approved IC request, OMB control number 2900-0586, for collection of information for both commercial and non-commercial item, service, and construction solicitations and contracts using VA Acquisition Regulation (VAAR) clause 852.211-72, Technical Industry Standards, as prescribed in C.F.R. Title 48, Federal Acquisition Regulations System, VAAR 811.204-70, Contract clause.

Authorities: 44 U.S.C. § 3507, Paperwork Reduction Act of 1995; and 48 C.F.R. §§ 1.301–1.304; and 48 C.F.R. § 811.204-70.

2. Use of the Information

VAAR clause 852.211-72, Technical Industry Standards, requires that items offered for sale to VA under the solicitation conform to certain technical industry standards, such as United States Department of Agriculture (USDA) Institutional Meat Purchase Specifications, and that the contractor furnish evidence to VA that the items meet that requirement. The evidence is normally in the form of a tag or seal affixed to the item, such as a label on beef product. In most cases, this requires no additional effort on the part of the contractor, as the items come from the factory with the tags already in place, as part of the manufacturer's standard manufacturing operation. Occasionally, for items not already meeting standards or for items not previously tested, a contractor will have

to furnish a certificate from an acceptable laboratory certifying that the items furnished have been tested in accordance with, and conform to, the specified standards. Only firms whose products have not previously been tested to ensure the products meet the industry standards required under the solicitation and contract will be required to submit a separate certificate. The information will be used to ensure that the items being purchased meet minimum safety standards and to protect VA beneficiaries and VA employees.

3. Use of Information Technology

VA almost always requests or allows offerors/contractors to submit this IC electronically – typically via email or uploaded into VA-provided portal links. VA complies with the policy in Federal Acquisition Regulation (FAR) 4.002 (Deviation, Nov 2025) that mandates using electronic commerce whenever practicable and cost-effective.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. Burden on Small Businesses

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. Less Frequent Collection

The information is needed on each product offered for sale to the Government rather than quarterly. The information is submitted with each quotation, bid, or offer.

7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 C.F.R. § 1320.5(d)(2). More specifically to one requirement – requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it. The information is submitted with each quotation, bid, or offer. The time for response is the same as the time for submission of the quotation, bid, or offer, which may be fewer than 30 days, especially for lower dollar value solicitations or for commercial items.

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection was published on Wednesday, September 17, 2025. The 60-Day FRN citation is 90 FR 44904. No comments were received during the 60-Day Comment Period.

A 30-Day FRN for this collection was published on Friday, November 21, 2025. The 30-Day FRN citation is 90 FR 52793.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the Federal Register was conducted for this submission.

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in this collection.

10. Confidentiality

- A Privacy Act Statement is not required for this collection because we are not requesting individuals to furnish personal information for a system of records.
- A System of Record Notice (SORN) is not required for this collection because records are not retrievable by Personally Identifiable Information (PII).
- A Privacy Impact Assessment (PIA) is not required for this collection because PII is not being collected electronically.
- No assurances of privacy/confidentiality will be provided to respondents. However, data will be kept private to the extent allowed by law. Information provided to VA by a contractor is subject to being requested by third parties under the Freedom of Information Act (FOIA), as amended (5 U.S.C. § 552), but business-proprietary information is generally exempt from public disclosure under the FOIA.
- This information collection does not require the submission of proprietary information.
- Contract laws and regulations specify record retention requirements for contracts. FAR subpart 4.7, Contractor Records Retention, states the required records retention period based on different contract actions and circumstances.

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

- 1) VAAR 852.211-72, Technical Industry Standards
 - a) Number of Respondents: 1,118
 - b) Number of Responses Per Respondent: 1 per solicitation
 - c) Number of Total Annual Responses: 1,118
 - d) Response Time: 30 minutes
 - e) Respondent Burden Hours: 559 hours
- 2) Total Submission Burden
 - a) Total Number of Respondents: 1,118
 - b) Total Number of Annual Responses: 1,118
 - c) Total Respondent Burden Hours: 559 hours

Part B: LABOR COST OF RESPONDENT BURDEN

- 1) VAAR 852.211-72, Technical Industry Standards
 - a) Number of Total Annual Responses: 1,118
 - b) Response Time: 30 minutes
 - c) Respondent Hourly Wage: \$52.29
 - d) Labor Burden per Response: \$26.15
 - e) Total Labor Burden: \$29,230
- 2) Overall Labor Burden
 - a) Total Number of Annual Responses: 1,118
 - b) Total Labor Burden: \$29,230

The Respondent hourly wage was determined by using the Bureau of Labor Statistics (BLS) website at <https://www.bls.gov/home.htm> and the particular information at [Purchasing Managers, Buyers, and Purchasing Agents 2024 Median pay \(bls.gov\)](#). The Bureau of Labor Statistics (BLS) gathers information on full-time wage and salary workers. According to the latest (May 2024) available BLS data, the mean hourly wage is \$38.38 on BLS wage code – “13-1020 Buyers and Purchasing Agents (Group/broad)” plus 36.25% per OMB Memo M-08-13 dated March 11, 2008, equals \$52.29 per hour.

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents, other than the labor burden costs addressed in Section 12 of this document, to complete this collection.

14. Cost to the Federal Government

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

- 1) VAAR 852.211-72, Technical Industry Standards
 - a) Number of Total Annual Responses: 1,118

- b) Processing Time per Response: 30 minutes
 - c) Hourly Wage of Workers Processing Responses: \$52.29
 - d) Cost to Process Each Response: \$26.145
 - e) Total Cost to Process Responses: \$29,230
- 2) Overall Labor Burden to the Federal Government
- a) Total Number of Annual Responses: 1,118
 - b) Total Labor Burden: \$29,230

Estimated annualized cost to the Government: \$17,653 (559 hours at \$31.58 per hour). It is estimated that the review and statement will be prepared by a Journeyman Contract Specialist equivalent to a GS-7. Based on a GS-7, step 5 salary, for FY25 – see Salary Table 2025-GS (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2025/GS_h.pdf) plus 36.25% per OMB Memo M-08-13 dated March 11, 2008, the hourly rate is ($\$23.18 \times 136.25\% = \31.58).

Part B: OPERATIONAL AND MAINTENANCE COSTS

- 1) Cost Categories
- a) Equipment: \$0
 - b) Printing: \$0
 - c) Postage: \$0
 - d) Software Purchases: \$0
 - e) Licensing Costs: \$0
 - f) Other: \$0
- 2) Total Operational and Maintenance Cost: \$0

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1) Total Labor Cost to the Federal Government: \$17,653
- 2) Total Operational and Maintenance Costs: \$0
- 3) Total Cost to the Federal Government: \$17,653

15. Reasons for Change in Burden

There is no burden hour change. The burden cost estimate has increased since the previous approval due to higher wage rates for the BLS labor rate and the GS pay rate. This results in a net increase of \$7,272 in burden cost, as shown below.

Summary of the cost differences between this SS and last SS

SS Block #	Cost This SS	Cost Last SS	Increase (Decrease)	Reason
12	\$29,230	\$23,724	\$5,506	Increase in BLS rate.

14	\$17,653	\$15,887	\$1,766	Increase in GS rate.
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16. Publication of Results

The results of these ICs will not be published.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on this collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

We are not requesting any exemptions to the provisions stated in 5 C.F.R. § 1320.9.