

## SUPPORTING STATEMENT - PART A

OMB Control Number 0704-0216 — Defense Federal Acquisition Regulation Supplement (DFARS) Part 228, Bonds and Insurance, and related clauses at 252.228

### Summary of Changes from Previously Approved Collection

- Increase in the number of respondents due to the use of more recent data.
- Increase in public burden due to the use of 2025 labor rates.

#### 1. Need for the Information Collection

This supporting statement justifies the information collection requirements that a contractor must submit to the Department of Defense (DoD) in response to the requirements of the clauses in the Defense Federal Acquisition Regulation Supplement (DFARS), part 228, Bonds and Insurance, and the related clauses at DFARS 252.228. Specific circumstances requiring information collection are as follows:

- a. DFARS 252.228-7000, Reimbursement for War-Hazard Losses, requires the contractor to provide notice and supporting documentation to the Government regarding claims or potential claims under the clause.
- b. DFARS 252.228-7005, Accident Reporting and Investigation Involving Aircraft, Missiles, and Space Launch Vehicles, requires the contractor to report promptly to the administrative contracting officer all pertinent facts relating to each accident involving an aircraft, missile, or space launch vehicle being manufactured, modified, repaired, or overhauled in connection with the contract.
- c. DFARS 252.228-7006, Compliance with Spanish Laws and Insurance, requires the contractor to provide a written representation that the non-Spanish contractor and any non-Spanish subcontractor have obtained the required types of insurance in the minimum amounts specified in the contract. This information is obtained only from non-Spanish concerns under service or construction contracts to be performed in Spain.

#### 2. Use of the Information

Contracting officers use the information provided by contractors under the clause at DFARS 252.225-7000 to assess the amount and extent of potential claims, open claims, and settlements providing war-hazard benefits to contractor employees. If this information is not provided, the contractor would not be reimbursed for such claims. Administrative contracting officers review the information provided under 252.225-7005 to determine the extent of an accident and whether an investigation into the incident is warranted. Contracting officers use the information provided by contractors under clause 252.228-7006 to assess whether or not a non-Spanish contractor or subcontractor, performing a service or construction contract in Spain, has insurance adequate to cover the risk assumed by the contractor. The contractor must provide the insurance information to the contracting officer prior to commencing work under the contract.

### 3. Use of Information Technology

Information technology is used to the maximum extent practicable. Where both the Government and the offeror or contractor are capable of electronic interchange, the information may be submitted electronically, and the usage of information technology is 100 percent.

### 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

Contractor information is provided to report an accident, to support filing of a claim against the Government, or to demonstrate adequate insurance coverage. These reports are on a case-by-case basis as required under the specific contract clause. Less frequent collection would impede contracting officers in performing their administrative functions in an effective and efficient manner and result in increased risk for the Government.

### 7. Paperwork Reduction Act Guidelines

This collection of information is consistent with the guidelines delineated in 5 CFR 1320.5(d) (2).

### 8. Consultation and Public Comments

#### a. Public Notice

i. A 60-day notice for the collection was published in the *Federal Register* on Jun 06, 2025, at 90 FR 24196. No comments were received during the 60-day comment period.

ii. A 30-day notice for the collection was published in the *Federal Register* on Jan 05, 2026, at 91 FR 256.

#### 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 the collection, other than remuneration to contractors under their contracts.

#### 10. Confidentiality

This information is disclosed only to the extent consistent with prudent business practices and current regulatory, statutory, and Freedom of Information Act requirements. No assurance of confidentiality is provided to respondents. A Privacy Act Statement is not required for this collection because DoD is 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.

#### 11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

#### 12. Respondent Burden and its Labor Costs

##### a. DFARS 252.228-7000

##### 1. Estimation of Respondent Burden

The hours under DFARS 252.228-7000, Reimbursement for War-Hazard Losses, remain unchanged based on a review of Department of Labor (DOL) data from the Office of Workers' Compensation Programs for Defense Base Act Cases by Nation. The DOL data revealed a total of 11 incidents over the last three fiscal years, resulting in an average of about 4 incidents per year, but because 10 respondents comprise the minimum number of respondents for an information collection, the estimate of 10 respondents was used for DFARS 252.228-7000.

Estimation of Respondent Burden Hours: 252.228-7000	
Number of respondents	10
Number of responses per respondent	1
Number of total annual responses	10
Hours per response	40
Annual respondent burden hours	400

##### 2. Labor Cost of Respondent Burden

The labor cost is based on the Office of Personnel Management (OPM) 2025 General Schedule (GS) for the locality pay area, Rest of U.S., Grade 12/Step 5 hourly rate of \$48.13 plus

36.25 percent burden (pursuant to OMB Memorandum M-08-13, dated March 11, 2008) of \$17.45 ( $\$48.13 \times 136.25\% = \$65.58$ ). The hourly rate of \$65.58 is rounded to \$66.

Labor Cost of Respondent Burden: 252.228-7000	
Number of total annual responses	10
Hours per response	40
Cost per hour (hourly wage)	\$66
Labor burden per response	\$2,640
Annual Labor Burden	\$26,400

b. DFARS 252.228-7005

1. Estimation of Respondent Burden

According to data from the Defense Contract Management Agency, the average number of reportable incidents under DFARS 252.228-7005, Accident Reporting and Investigation Involving Aircraft, Missiles, and Space Launch Vehicles, rose from 20 per year to 31 per year during fiscal years 2022 through 2024. The 50% increase in accidents is largely attributed to the reduced number of accidents between fiscal years 2019 and 2021, when COVID caused operations to run below full capacity. Consequently, the numbers from that period may appear skewed. As operations returned to normal levels, the number of accidents also rose.

Estimation of Respondent Burden Hours: 252.228-7005	
Number of respondents	31
Number of responses per respondent	1
Number of total annual responses	31
Hours per response	1
Annual respondent burden hours	31

2. Labor Cost of Respondent Burden

The labor cost is based on the Office of Personnel Management (OPM) 2025 General Schedule (GS) for the locality pay area, Rest of U.S., Grade 12/Step 5 hourly rate of \$48.13 plus 36.25 percent burden (pursuant to OMB Memorandum M-08-13, dated March 11, 2008) of \$17.45 ( $\$48.13 \times 136.25\% = \$65.58$ ). The hourly rate of \$65.58 is rounded to \$66.

Labor Cost of Respondent Burden: 252.228-7005	
Number of total annual responses	31

Hours per response	1
Cost per hour (hourly wage)	\$66
Labor burden per response	\$66
Annual Labor Burden	\$2,046

c. DFARS 252.228-7006

1. Estimation of Respondent Burden

The estimated burden for respondents under DFARS 252.228-7006, Compliance with Spanish Laws and Insurance, increased based on a review of data from the Federal Procurement Data System for fiscal years 2022 through 2024. The awards for contracts, purchase orders, task orders, delivery orders, and calls for non-Spanish vendors was averaged for the past three years and 50% added to account for any potential subcontractors.

Estimation of Respondent Burden Hours: 252.228-7006	
Number of respondents	344
Number of responses per respondent	1
Number of total annual responses	344
Hours per response	0.5
Annual respondent burden hours	172

2. Labor Cost of Respondent Burden

The labor cost is based on the Office of Personnel Management (OPM) 2025 General Schedule (GS) for the locality pay area, Rest of U.S., Grade 12/Step 5 hourly rate of \$48.13 plus 36.25 percent burden (pursuant to OMB Memorandum M-08-13, dated March 11, 2008) of \$17.45 ( $\$48.13 \times 136.25\% = \$65.58$ ). The hourly rate of \$65.58 is rounded to \$66.

Labor Cost of Respondent Burden: 252.228-7006	
Number of total annual responses	344
Hours per response	0.5
Cost per hour (hourly wage)	\$66
Labor burden per response	\$33
Annual Labor Burden	\$11,352

d. Total for 252.228-7000, 252.228-7005, and 252.228-7006

1. Total Submission Burden

The total estimated burden hours for DFARS 252.228-7000, 252.228-7005, and 252.228-7006 are provided in the following table:

Estimation of Respondent Burden Hours: 0704-0216	
Total number of respondents	385
Total number of annual responses	385
Total burden hours	603

2. Overall Labor Burden

The total estimated labor cost of the respondent burden for DFARS 252.228-7000, 252.228-7005, and 252.228-7006 is provided in the following table:

Labor Cost of Respondent Burden: 0704-0216	
Total number of annual responses	385
Annual Labor Burden	\$39,798

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

a. Labor Cost to the Federal Government

1. DFARS 252.228-7000

Labor Cost to the Federal Government: 252.228-7000	
Number of total annual responses	10
Hours per response	32
Cost per hour (hourly wage)	\$66
Cost per response	\$2,112
Total cost	\$21,120

2. DFARS 252.228-7005

Labor Cost to the Federal Government: 252.228-7005	
Number of total annual responses	31
Hours per response	32
Cost per hour (hourly wage)	\$66
Cost per response	\$2,112
Total cost	\$65,472

3. DFARS 252.228-7006

Labor Cost to the Federal Government: 252.228-7006	
Number of total annual responses	344
Hours per response	0.5
Cost per hour (hourly wage)	\$66
Cost per response	\$66
Total cost	\$11,352

4. Total for 252.228-7000, 252.228-7005 and 252.228-7006

Overall Labor Burden to the Federal Government	
Total number of annual responses	385
Total Labor Burden	\$97,944

b. Operational and Maintenance Costs

There are no operational and maintenance costs for the Federal Government associated with this information collection.

c. Total Cost to the Federal Government

Total labor burden	\$97,944
Total operational and maintenance costs	\$0
Total cost to the Federal Government	\$97,944

15. Reasons for Change in Burden

The changes to the estimates in paragraphs 12 and 14 above are primarily due to the following: (1) changing the number of respondents based on current data; and (2) using the 2025 OPM hourly rate. The following table summarizes the changes:

0704-0216			
Change in Burden	2022	2025	Difference
Number of respondents	311	385	+74
Total annual responses	311	385	+74
Total Hours	560.5	603	+42
Cost per hour	\$59	\$66	+\$7
Total Cost	\$33,070	\$39,798	+\$6,728

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

DoD is not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to “Certification for Paperwork Reduction Submissions”

DoD is not requesting any exemptions to the provisions stated in 5 CFR 1320.9.