

## SUPPORTING STATEMENT - PART A

### **Supporting Statement for Department of Veterans Affairs Acquisition Regulation (VAAR) Contract Clause— Information and Information Systems Security OMB Control No. 2900-0900**

#### Summary of Changes from the Previously Approved Collection

- This is a “revision of a currently approved collection” because this submission revises the title from ““Department of Veterans Affairs Acquisition Regulation (VAAR) 804.1970 and Clause 852.204-71” to “Department of Veterans Affairs Acquisition Regulation (VAAR) Contract Clause—Information and Information Systems Security”.
- There are no revisions to the previously approved information collection (IC) instrument.
- The supporting statement was updated to the current format.
- Section 3 was revised to reflect the expanded use of electronic submission of information.
- Section 7 provides expanded discussion on the Paperwork Reduction Act (PRA) Guidelines.
- Section 15 shows there is no change in burden hours from the previous approval. The burden cost of these information collections increased by \$38,086 because wage rates are higher.
- The 60-day comment period ended on 3/6/2026. VA received no comments.

#### 1. Need for the Information Collection

The Department of Veterans Affairs (VA), Office of Acquisition and Logistics, requests the Office of Management and Budget (OMB) grant an extension of previously approved information collections (IC) under OMB control number 2900-0900, for VA Acquisition Regulation (VAAR) 804.1970 Information security policy—contractor general responsibilities, and clause 852.204-71 Information and Information Systems Security.

The VAAR and VAAR clause contain the following information collection requirements:

<b>Information Collection Requirement</b>	<b>Clause/Section</b>
Contractor/subcontractor employee reassignment and termination notification	852.204-71
Report of known or suspected security/privacy incident and data breach	852.204-71, 804.1970
Provide an annual training certificate	852.204-71
Submission of data retention, destruction plan and contractor self-certification	852.204-71
Maintain records and compliance reports regarding HIPAA security and privacy rule compliance	804.1970

Submission of a detailed security plan	852.204-71
Report of all requests for, demands for production of, or inquiries, including court orders, about VA information and information systems	852.204-71

**Authority:** Public Law 113-283, Federal Information Security Modernization Act of 2014 (FISMA), requires each federal agency to secure information and information systems that support the operations of the agency, including those provided or managed by a contractor, or other source.

2. Use of the Information

Clause 852.204-71, Information and Information System Security, is required to be inserted by the contracting officer when the clause at FAR 52.204-21, Basic Safeguarding of Covered Contractor Information Systems is required to be included in accordance with FAR 4.1903. This includes when the contractor or a subcontractor at any tier may have Federal contract information residing in or transiting through its information system.

This clause is intended to protect VA information, VA sensitive information and information systems by requiring contractor and subcontractor personnel to be subject to the same Federal laws, regulations, standards, and VA directives and Handbooks as VA and VA personnel regarding information and information system security.

3. Use of Information Technology

VA almost always requests or allows offerors/contractors to submit these ICs 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 these collections is unique and is not already available for use or adaptation from another cleared source. The information collection required by the clause is based on events happening during the contract period and on specific contracts.

5. Burden on Small Businesses

These information collections do not impose a significant economic impact on a substantial number of small businesses or entities. Small businesses will be affected in the same way as large businesses.

6. Less Frequent Collection

Less frequent collection of information could expose vulnerabilities in VA sensitive information and information technology.

VA does not expect that a contractor/subcontractor will submit a response more often than quarterly, unless a second contractor employee working on a VA system or with access to VA information leaves the contractor or subcontractor's employ during that quarter.

#### 7. Paperwork Reduction Act Guidelines

These collections of information do 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 – the nature and extent of confidentiality, the protection of contractor proprietary, trade secret, or other confidential information; the Government's right to use that data is covered by contract-specific clauses available to all offerors.

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.

#### 8. Consultation and Public Comments

##### Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for these collections was published on Monday, January 5, 2026. The 60-Day FRN citation is 91 FR 330. No comments were received during the 60-Day Comment Period.

A 30-Day FRN for this collection was published on Thursday, March 19, 2026. The 30-Day FRN citation is 91 FR 13407.

##### Part B: CONSULTATION

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

#### 9. Gifts or Payment

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

#### 10. Confidentiality

- A Privacy Act Statement is not required for these collections 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 these collections because records are not retrievable by Personally Identifiable Information (PII).
- A Privacy Impact Assessment (PIA) is not required for these collections 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.
- These information collections do not require the submission of proprietary information.

11. Sensitive Questions

No questions considered sensitive are being asked in these collections.

12. Respondent Burden and its Labor Costs

Part A: ESTIMATION OF RESPONDENT BURDEN

The update does not alter the burden hour calculation below, from what was reported previously.

852.204-71, Information and Information System Security and section 804.1970, Information security policy—contractor general responsibilities.

Total Burden Hours: 4,069  
 Total Number of Responses: 8,223  
 Average Number of Respondents: 1,175  
 Total Annual Responses: 8,223

Contractor/subcontractor employee reassignment and termination notification.

No. of respondents	x No. of responses per respondent	x No. of minutes	÷ by 60	Number of Burden Hours
1,357	1	5		

Report of known or suspected security/privacy incident and data breach.

No. of respondents	x No. of responses per respondent	x No. of minutes	÷ by 60	Number of Burden Hours
807	1	180		

Submission of contractor/subcontractor employee annual training certificate.

No. of respondents	x No. of responses per respondent	x No. of minutes	÷ by 60	Number of Burden Hours
3,016	1	2		

Submission of data retention, destruction plan and contractor self-certification.

No. of respondents	x No. of responses per respondent	x No. of minutes	÷ by 60	Number of Burden Hours
452	1	5		

Maintain records and compliance reports regarding HIPAA security and privacy rule compliance.

No. of respondents	x No. of responses per respondent	x No. of minutes	÷ by 60	Number of Burden Hours
2,138	1	30		

Detailed security plan submission.

No. of respondents	x No. of responses per respondent	x No. of minutes	÷ by 60	Number of Burden Hours
302	1	60		

Report of all requests for, demands for, production of, or inquiries, including court orders, about VA information and information systems.

No. of respondents	x No. of responses per respondent	x No. of minutes	÷ by 60	Number of Burden Hours
151	1	10		

#### Part B: LABOR COST OF RESPONDENT BURDEN

852.204-71, Information and Information System Security and section 804.1970, Information security policy—contractor general responsibilities.

Number of Total Annual Responses: 8,223

Response Time: 4,069 hours

Respondent Hourly Wage: \$49.96

Labor Burden per Response: \$25

Total Labor Burden: \$203,287

Total estimated annual cost to all respondents: \$ 203,287 (4,069 hours at \$49.96 per hour). This is based on the Bureau of Labor Statistics May 2024 [Occupational Employment and Wages code](#) “15-1231 Computer Network Support Specialists” mean hourly wage is \$36.67 plus 36.25% fringe benefits per OMB Memo M-08-13 dated March 11, 2008.

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 these collections.

14. Cost to the Federal Government

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

852.204-71, Information and Information System Security and section 804.1970, Information security policy—contractor general responsibilities.

Burden Hours: 4,069

Hourly Rate: \$47.20

Cost: \$192,057

\$192,057 (4,069 hours at \$47.20, based on 2026 OPM Salary Table, including benefits of 36.25% per OMB Memo M-08-13 dated March 11, 2008, of the average GS 11, Step 5, VA contract specialist).

It is estimated that the review will be prepared by a Contract Specialist equivalent to a GS-11. Based on a GS-11, step 5 salary, for 2026 – see Salary Table 2026 GS (<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/>) plus 36.25% per OMB Memo M-08-13 dated March 11, 2008, the hourly rate is ( $\$34.64 \times 136.25\% = \$47.20$ ).

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: \$192,057

2) Total Operational and Maintenance Costs: \$0

3) Total Cost to the Federal Government: \$192,057

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. This results in an increase of \$38,086 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	\$203,287	\$189,371	\$13,916	Increase in BLS wage rate.
14	\$192,057	\$167,887	\$24,170	Increase in GS wage rate.

16. Publication of Results

The results 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 these collection instruments.

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.