

General Services Administration
Modifications (Multiple Award Schedules)
OMB Control Number, 3090-0235
Justification – Part A Supporting Statement

Overview of Information Collection:

This is a request for approval of a revision of an existing information collection.

This information collection applies to certain offerors and contractors under the General Services Administration's (GSA) Federal Supply Schedule (FSS) program (also known as the Multiple Award Schedule (MAS)). The information collected relates to certain pricing disclosures and sales reporting requirements that apply to certain GSA FSS offerors and contractors (these requirements are sometimes referred to as CSP/PRC requirements). These requirements apply to GSA FSS offeror and contractors who are not subject to transactional data reporting (TDR) requirements.¹

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

- 515.408(b) and (c)*
- 538.273

The following are the GSAR clauses² covered by this information collection:

- Basic version of 552.238-80, Industrial Funding Fee and Sales Reporting*
- Basic version of 552.238-81, Price Reductions*
- 552.238-83 Examination of Records by GSA
- 552.238-85, Contractor's Billing Responsibilities
- 552.238-120, Economic Price Adjustment—Federal Supply Schedule Contracts

*See CD-2025-13 for information about the impact to these GSAR sections/clauses and the requirements covered by this information collection.

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

- The following GSAR requirements were removed from this information collection.
 - 516.203-4. This section is removed because the basic version and alternate I of 552.216-70, Economic Price Adjustment—FSS Multiple Award Schedule Contracts has been removed from the GSAR. The clause, including its alternate,

¹The burden associated with TDR requirements is covered by OMB control number 3090-0306, Transactional Data Reporting.

²GSAR clauses 552.238-80 and 552.238-81 have Alternate versions. This information collection only captures the burden associated with the basic version of these clauses. The burden associated with the Alternate version of these clauses is covered by information collection 3090-0306, Transactional Data Reporting.

were removed from the GSAR via GSAR Case 2020-G510 Final Rule, effective September 4, 2024 (see 89 FR 63325).

- Basic version and alternate I of 552.216-70, Economic Price Adjustment—FSS Multiple Award Schedule Contracts. This clause was removed from the GSAR via GSAR Case 2020-G510 Final Rule, effective September 4, 2024 (see 89 FR 63325).
- The following GSAR clause is added to this information collection.
 - 552.238-120, Economic Price Adjustment—Federal Supply Schedule Contracts. The clause is added to this information collection as it replaced the basic version and alternate I of 552.216-70, Economic Price Adjustment—FSS Multiple Award Schedule Contracts. This clause was added to the GSAR via GSAR Case 2020-G510 Final Rule, effective September 4, 2024 (see 89 FR 63325).
- The following recently issued acquisition policy impacts this information collection.
 - Class Deviation CD-2025-13, *Revised Transactional Data Reporting (TDR) Requirements for the Federal Supply Schedule (FSS) Program*, was issued on June 26, 2025. The class deviation (CD) amends the GSAR to make TDR requirements mandatory for the FSS program. As a result, the pricing disclosures and sales reporting requirements covered by this information collection will no longer apply. GSA anticipates completing the transition to TDR by the end of Year 1 of this renewal.
- The total estimated response per year decreased due to the use of updated data and the transition to TDR during this renewal period. The total estimated responses changed-
 - From: 46,900
 - To: 30,684 for Year 1 and 0 for Years 2 & 3
- The total estimated annual public hour burden decreased due to the use of updated data and the transition to TDR during this renewal period. The total estimated annual public hour burden changed-
 - From: 1,452,326
 - To: 935,662 for Year 1 and 0 for Years 2 & 3
- The total estimated annual public cost burden decreased due to the use of updated data and the transition to TDR during this renewal period. The total estimated annual public cost burden changed-
 - From: \$117,802,198
 - To: \$84,629,455 for Year 1 and \$0 for Years 2 & 3

1. Need & Method for the Information Collection.

The information being collected under this information collection is tied to the aforementioned GSAR sections and clauses. The information collected relates to certain pricing disclosures and sales reporting requirements that apply to certain FSS offerors and contractors. However, FSS offerors and existing contractors subject to these requirements will be transitioned to TDR requirements. GSA anticipates completing the transition to TDR by the end of Year 1 of this renewal period.

Until the GSAR is formally amended via a Final Rule, the below represents the pricing disclosures and sales reporting requirements currently codified in the GSAR covered by this information collection.

a. Solicitation requirements.

- GSAR 515.408(b) prescribes the commercial sales practices format that applicable FSS offerors are to complete when submitting their offer.
- GSAR 515.408(c) prescribes the instructions for completing the commercial sales practices format prescribed in 515.408(b). FSS offerors are required to submit the information required in GSAR 515.408(b) as part of their offer.

b. Clause requirements.

- Clause prescription. GSAR section 538.273 includes the prescription for the following GSAR clauses: 552.238-80; 552.238-81; 552.238-83; and 552.238-85.
- Clauses. The GSAR clauses covered by this information collection apply to contractors that hold a FSS contract that are subject to certain pricing disclosures and sales reporting requirements (e.g., sometimes referred to as non-TDR contracts). These GSAR clauses require contractors to submit information, as necessary, as part of contract performance. The following is the information requested per clause:
 - Basic version of GSAR clause 552.238-80, Industrial Funding Fee and Sales Reporting. The basic version of this clause requires contractors to report once a quarter contract sales as well as to remit the Industrial Funding Fee (IFF) due to GSA. Sales reporting includes reporting any instances where “zero” sales occurred during the reporting period as well.
 - Basic version of GSAR clause 552.238-81, Price Reductions. The basic version of this clause requires a contractor to notify the FSS contracting officer of all price reductions to the customer (or category of customers) that was the basis of award. The contractor's report shall include an explanation of the conditions under which the reductions were made. The basic version of this clause also allows the contractor to offer the FSS contracting officer a voluntary Governmentwide price reduction at any time during the contract period.
 - 552.238-83, Examination of Records by GSA. This clause requires contractors

(regardless if TDR requirements apply or not) to maintain certain records and to ensure the Administrator of General Services or any duly authorized representative have to and the right to examine any books, documents, papers and records of the contractor involving transactions related to this contract for overbillings, billing errors, compliance with GSAR clauses 552.238-81 and 552.238-80.

- 552.238-85, Contractor's Billing Responsibilities. The clause allows a contractor to authorize their dealer(s) to bill ordering activities and accept payment on behalf of the contractor (regardless if TDR requirements apply or not). In this case, the contractor and dealer must enter into an agreement that includes, but not limited to, the dealer agreeing to maintain certain records on sales under the contractor's FSS contract. This record keeping requirement does not add any additional burden to what is already captured by GSAR clause 552.238-80.
- 552.238-120, Economic Price Adjustment—Federal Supply Schedule Contracts. This clause allows contractors (regardless if TDR requirements apply or not) to request economic price adjustments during contract performance. Contractors requesting price adjustment must submit requests that fully conform to the requirements of the economic price adjustment method and include sufficient information to support the request.

The information collected is submitted electronically (to the maximum extent possible) and is included, if applicable, within an offer or is submitted by a contractor during contract performance.

2. Use of the Information.

The information collected under the GSAR requirements identified in Section 1 is used by FSS contracting officers to perform pre-award and post-award activities tied to offerors and contractors subject to these requirements. The information collected under this information collection is used in a variety of ways depending on the requirements. For example, the information-

- Obtained by FSS contracting officers under GSAR 515.408 is used in their review and evaluation of an offer subject to these pricing disclosures and sales reporting requirements.
- Obtained by GSA under GSAR clause 552.238-80 supports the collection of the IFF and administration of the FSS program.
- Retained by the contractor under GSAR clause 552.238-83 supports contract audits for purposes of contract surveillance and verification for overbillings, billing errors, compliance with GSAR clauses 552.238-81 and 552.238-80.

The information collected is not used by other Federal agencies.

3. Use of Information Technology.

The Government uses information technology to the maximum extent practicable. For the

purposes of this information collection, both offerors and contractors submit the information required electronically to the maximum extent possible.

4. Non-Duplication.

GSA did not identify any duplication of information being collected under this information collection. The information provided by an offeror/contractor is unique and specific to their organization and offer/contract.

This information is not collected elsewhere and could not otherwise be obtained.

For example, the information collected under-

- 515.408 is specific and unique to an offeror's response and applies only to offerors submitting an offer when certain pricing disclosures and sales reporting requirements apply. As a result, it is the offeror that determines based on their offer what information, if any, to submit with their offer.
- The aforementioned GSAR clauses are specific and unique to a contractor and apply only to FSS contracts for which certain pricing disclosures and sales reporting requirements apply. As a result, the contractor is responsible for complying with their FSS contract, which means determining what information, if any, to submit as well as records they need to retain.

Any similar information that may already be available to GSA cannot be used or modified to be used for the purposes described. As only an offeror/contractor knows the information that applies to their offer/contract, specifically the information needed, if any, to respond to the GSAR requirements covered by this information collection.

5. Burden on Small Business.

The burden applies equally to both small businesses and other than small businesses that are seeking to obtain or have a FSS contract for which these pricing disclosures and sales reporting requirements apply.

The submission of this information is provided with an offer or is submitted during contract performance and is based upon decisions/actions made by the offeror/contractor not the Government. The information requested is the minimum necessary to support the objectives of the given action (e.g., collection of sales data or processing a contractor's request for a price increase). For example, the degree of burden associated with GSAR clause 552.238-80 is dependent on the amount of contract sales a contractor experiences during a given reporting period. As a result, a contractor who has no or very low sales has a lower burden than a contractor who has very high sales during a given reporting period.

6. Less Frequent Collection.

The frequency of collection is limited to the extent necessary to support the needs of the Government for purposes of supporting the FSS program in relation to solicitations and contracts subject to certain pricing disclosures and sales reporting requirements. The information is provided by an offeror as part of their offer or is submitted by a contractor during contract performance. Offerors/Contractors subject to TDR requirements are not covered by this information collection.

Until offerors and contractors covered by this information collection transition to TDR, failing to collect this information or collecting this information less frequently would impede GSA's ability to efficiently and effectively operate the FSS program. For example, the lack of or timely submission of sales data impedes GSA's ability to determine whether contractors have met the minimum sales requirement, evaluate the program's performance, monitor small business participation, and other key performance/contract indicators/requirements as required by the GSAR clauses covered by this information collection.

7. Paperwork Reduction Act Guidelines.

Not applicable, no special circumstances exist for this information collection.

8. Consultation and Public Comments.

A 60-day notice was published in the *Federal Register* at 90 FR 47307 on October 1, 2025. No public comments were received.

A 40-day notice was published in the *Federal Register* at 90 FR 58559 on December 17, 2025.

9. Gifts or Payment.

Not applicable, GSA makes no such payments or gifts to respondents under this information collection.

10. Privacy & Confidentiality.

Not applicable, GSA makes no additional assurances under this information collection beyond what is already applicable to contract information (i.e., information collected is disclosed only to the extent consistent with prudent business practices, agency regulations, and applicable statutes). This information collection does not require collection of "personally identifiable information". GSA uses information technology to the maximum extent practicable.

11. Sensitive Questions.

Not applicable, no sensitive questions are involved under this information collection.

12. Burden Estimate.

Year 1

The total estimated cost burden to the public for Year 1 resulting from this information collection is \$84,629,455. The total estimated public hour burden for Year 1 resulting from this information collection is 935,662 hours. The estimates are calculated by adding up the total for each of the GSAR sections/clauses covered by this information collection.

Years 2 & 3

The total estimated annual cost burden to the public for Years 2 & 3 resulting from this information collection is \$0. The total estimated annual public hour burden for Years 2 & 3 resulting from this information collection is 0 hours. These estimates are based on the transition to TDR being completed by the end of Year 1.

The burden estimates for Year 1 are based on the following calculations:

● Changes Due to Adjustment in Agency Estimate:

An updated estimated # of respondents per year used for each of the sections/clauses covered by this information collection. The change in the numbers can be attributed to GSA using more recent data and accounting for the transition to the TDR by the end of Year 1 of this renewal.

	Requested	Change Due to New Statute	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	Year 1 30,684 Years 2 & 3 0	N/A	N/A	Year 1 (\$33,172,743) Years 2 & 3 (46,950)	N/A	46,950
Annual IC Time Burden (Hour)	Year 1 935,662 Years 2 & 3 0	N/A	N/A	Year 1 (516,664) Years 2 & 3 (1,452,326)	N/A	1,452,326
Annual IC Cost Burden (Dollars)	Year 1 \$84,629,455 Years 2 & 3 \$0	N/A	N/A	Year 1 (\$16,266) Years 2 & 3 (\$117,802,198)	N/A	\$117,802,198

Burden per Response:

	Time Per Response (Hours)	Cost Per Response (Dollars)
Reporting	varies*	varies*

Record Keeping	varies*	varies*
Third Party Disclosure	N/A	N/A
Total	N/A	N/A

*These numbers vary based on various factors and the applicable GSAR clause as well as the transition to TDR during Year 1.

Annual Burden:

	Annual Time Burden (Hours)	Annual Cost Burden (Dollars)
Reporting	Year 1 = 926,319 Years 2 & 3 = 0	Year 1 = \$83,768,567 Years 2 & 3 = \$0
Record Keeping	Year 1 = 9,343 Years 2 & 3 = 0	Year 1 = \$860,888 Years 2 & 3 = \$0
Third Party Disclosure	N/A	N/A
Total	Year 1 = 935,662 Years 2 & 3 = 0	Year 1 = \$84,629,455 Years 2 & 3 = \$0

The following calculations represent the estimated burden associated with the requirements covered by this information collection for Year 1.

GSAR solicitation instructions and format prescribed by GSAR 515.408(b) and (c)³.

Heavier Lift and Lighter Lift

Total estimated burden hours: 0
Total estimated cost burden: \$0.00

GSAR clause 552.238-120, Economic Price Adjustment—Federal Supply Schedule Contracts.

Estimated # of responses: 1200
Estimated burden hours per response: x 9.17
Total estimated burden hours: 11,004

Estimated cost per hour***: x \$77.98
Total estimated cost burden: \$858,047

Basic version of GSAR clause 552.238-80, Industrial Funding Fee and Sales Reporting.

Set-up⁴

³FSS offerors will be following TDR requirements prior to the renewal of this information collection; thereby why the burden associated with this GSAR section is zero.

Estimated # of respondents:	0
Total estimated response burden hours:	0
Total estimated cost burden:	\$0

Reporting

Estimated # of respondents:	9,828
Total estimated response burden hours:	53,897
Total estimated cost burden:	\$3,534,397

Basic version of GSAR clause 552.238-81, Price Reductions.

Training - Heavier Lift

Estimated # of responses per year:	1,966
Estimated burden hours per response:	<u>x 40</u>
Total estimated burden hours:	78,624

Estimated cost per hour*:	<u>x \$92.15</u>
Total estimated cost burden:	\$7,244,877

Training - Lighter Lift

Estimated # of responses per year:	7,862
Estimated burden hours per response:	<u>x 20</u>
Total estimated burden hours:	157,248

Estimated cost per hour*:	<u>x \$92.15</u>
Total estimated annual cost burden:	\$14,489,755

Monitoring - Heavier Lift

Estimated # of responses per year:	1,966
Estimated burden hours per response:	<u>x 175</u>
Total estimated burden hours:	343,980

Estimated cost per hour*:	<u>x \$92.15</u>
Total estimated cost burden:	\$31,696,338

Monitoring - Lighter Lift

Estimated # of responses per year:	7,862
Estimated burden hours per response:	<u>x 35</u>
Total estimated burden hours:	75,184

Estimated cost per hour*:	<u>x \$92.15</u>
Total estimated annual cost burden:	\$25,357,070

⁴This estimated burden for set-up for Year 1 is 0 burden hours and \$0.00 cost burden. This is because there will be no new FSS contractors needing to set-up as all new awards will be covered by TDR prior to the renewal of this information collection. Altogether, it is anticipated that there will only be existing FSS contractors having to report under this clause until such time they themselves transition to TDR.

Notification	
Estimated # of responses per year:	1502
Estimated burden hours per response:	<u>x 4.25</u>
Total estimated burden hours:	6,382
Estimated cost per hour*:	<u>x \$92.15</u>
Total estimated cost burden:	\$588,083

GSAR clause 552.238-83 Examination of Records by GSA.

Estimated # of respondents per year:	21
Estimated burden hours per respondent:	<u>x 455</u>
Total estimated burden hours:	9,343
Estimated cost per hour*:	<u>x \$92.15</u>
Total estimated cost burden:	\$860,888

*The estimated cost per hour is based on the Office of Personnel Management (OPM) GS-14, Step 5 salary of \$67.63 per hour (see OPM Salary Table 2025-RUS, Effective January 2025), plus a fringe factor of 36.25% (\$24.52) (see OMB Memo M-08-13), which results in an hourly rate of \$92.15.

**The estimated cost per hour is based on the Office of Personnel Management (OPM) GS-13, Step 5 salary of \$57.23 per hour (see OPM Salary Table 2025-RUS, Effective January 2025), plus a fringe factor of 36.25% (\$20.75) (see OMB Memo M-08-13 for use in public-private competition), which results in an hourly rate of \$77.98.

13. Estimated nonrecurring costs.

Not applicable to this information collection.

14. Estimated cost to the Government.

The total estimated cost burden to the Government for Year 1 is \$4,278,074. The total estimated burden hours to the Government for Year 1 is \$63,157. The estimated annual burden to the Government for Years 2 & 3 is anticipated to be \$0.00 as a result of the transition to TDR.

Year 1 estimates are based on the following calculations:

GSAR solicitation instructions and format prescribed by GSAR 515.408(b) and (c)⁵.

Heavier Lift and Lighter Lift	
Total estimated burden hours:	0

⁵See footnote #5

Total estimated cost burden: \$0.00

GSAR clause 552.238-120, Economic Price Adjustment—Federal Supply Schedule Contracts.

Estimated # of response: 1,200
Estimated average burden hours per response: x 9.17
Total estimated burden hours: 11,004

Estimated cost per hour* x \$77.98
Total estimated cost to the Government \$858,047

Basic version of GSAR clause 552.238-80, Industrial Funding Fee and Sales Reporting.

Estimated # of assessment hours: 36,428
Estimated cost per hour**:
Total estimated cost burden to the Government: \$65.58
\$2,388,844

Basic version of GSAR clause 552.238-81, Price Reductions.

Estimated # response per year: 1,502
Estimated # hours per response: x 4.25
Total estimated burden hours: 6,382

Estimated cost per hour**:
Total estimated cost to the Government x \$65.58
\$418,519

GSAR clause 552.238-83 Examination of Records by GSA.

Estimated # of audits per year: 21
Estimated hours per audit: x 455
Total estimated burden hours: 9,343

Estimated cost per hour**:
Total estimated cost to the Government x \$65.58
\$612,665

*The estimated cost per hour is based on the Office of Personnel Management (OPM) GS-13, Step 5 salary of \$57.23 per hour (see OPM Salary Table 2025-RUS, Effective January 2025), plus a fringe factor of 36.25% (\$20.75) (see OMB Memo M-08-13 for use in public-private competition), which results in an hourly rate of \$77.98.

**The estimated cost per hour is based on the Office of Personnel Management (OPM) GS-12, Step 5 salary of \$48.13 per hour (see OPM Salary Table 2025-RUS, Effective January 2025), plus a fringe factor of 36.25% (\$17.45) (see OMB Memo M-08-13 for use in public-private competition), which results in an hourly rate of \$65.58.

15. Reasons for changes.

Unless otherwise explained below, the majority of changes are a result of using current information and accounting for the transition to TDR during Year 1 of the renewal of this information collection.

For Item 12, an updated estimated cost per hour (i.e., hourly rate) for GS-14, Step 5 employee was used. The previous extension used OPM's Salary Table from 2022, whereas this extension is using OPM's Salary Table Effective January 2025.

For Items 12 and 14, an updated estimated cost per hour (i.e., hourly rate) for GS-12, Step 5 employee was used. The previous extension used OPM's Salary Table from 2022, whereas this extension is using OPM's Salary Table Effective January 2025.

For Item 14, an updated estimated cost per hour (i.e., hourly rate) for GS-13, Step 5 employee was used. The previous extension used OPM's Salary Table from 2022, whereas this extension is using OPM's Salary Table Effective January 2025.

16. Publicizing Results.

Not applicable, results of this information collection will not be published. Information collected is used for internal purposes only.

17. OMB Not to Display Approval.

Not applicable, GSA is not seeking such approval for this information collection.

18. Exceptions to "Certification for Paperwork Reduction Submissions."

Not applicable, GSA has no exceptions to the certification statement.

19. Surveys, Censuses, and Other Collections that Employ Statistical Methods.

Not applicable, statistical methods are not used for this information collection.