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MEMORANDUM

To: Hon. Edward Forst, Administrator, General Services Administration
From: Andrew Langer, Director, Center for Regulatory Freedom, CPAC Foundation
Date: February 8, 2026
Re: GSA Federal Acquisition Regulation Notice, “Agency Information Collection Activities; Proposals, Submissions, and Approvals: Buy American, Trade Agreements, and Duty-Free Entry (9000-0024),” Docket #FAR-2025-0054, Fed. Reg. 2025-22581, Published December 11, 2025

Below are comments of the American Conservative Union Foundation's (d/b/a. Conservative Political Action Coalition Foundation) (hereinafter “CPAC Foundation”) Center for Regulatory Freedom (hereinafter “CRF”), in response to the GSA Federal Acquisition Regulation Notice, “Agency Information Collection Activities; Proposals, Submissions, and Approvals: Buy American, Trade Agreements, and Duty-Free Entry (9000-0024),” Docket #FAR-2025-0054, Fed. Reg. 2025-22581, published December 11, 2025.

CRF is a project of the CPAC Foundation, a non-profit, non-partisan 501(c)(3) research and education foundation. Our mission is to inject a common-sense perspective into the regulatory process, to ensure that the risks and costs of regulations are fully based on sound scientific and economic evidence, and to ensure that the voices, interests, and freedoms of Americans, and especially of small businesses, are fully represented in the regulatory process and debates. Finally, we work to ensure that regulatory proposals address real problems, that the proposals serve to ameliorate those problems, and, perhaps most importantly, that those proposals do not, in fact, make public policy problems worse.

Introduction

The CPAC Foundation’s Center for Regulatory Freedom (CRF) appreciates the opportunity to comment on the proposed extension of the information collection associated with FAR 52.225-18, *Place of Manufacture*, under OMB Control No. 9000-0161. CRF regularly engages on issues at the intersection of federal procurement policy, administrative law, and the Paperwork

Reduction Act (PRA), with particular attention to how regulatory design choices affect competition, affordability, and economic accountability. Our work emphasizes disciplined application of the PRA to ensure that federal information collections are grounded in practical utility, proportionality, and demonstrable public benefit.

This particular information collection is narrow in scope but significant in function. FAR 52.225-18 requires offerors of manufactured end products to indicate whether those products are predominantly manufactured in the United States or outside the United States. The resulting data is entered into the Federal Procurement Data System (FPDS) and used to inform analysis of sourcing patterns in federal acquisition. While the reporting mechanism itself is limited—a checkbox representation—it contributes to a broader data architecture intended to measure procurement outcomes.

It is important to distinguish this proceeding from other Buy American–related information collections that require detailed certifications regarding country of origin, domestic content thresholds, or trade agreement applicability. Those collections serve as substantive compliance verification tools and are tied directly to eligibility determinations and enforcement risk. By contrast, the reporting under FAR 52.225-18 functions primarily as a data capture mechanism. It does not, standing alone, determine compliance or trigger enforcement consequences in the same manner as formal certifications. The distinction matters for purposes of PRA analysis, because the justification for this collection rests on transparency and measurement rather than front-end statutory enforcement.

The central policy question underlying this reporting requirement is straightforward but consequential: how much of federal procurement spending is directed toward products manufactured outside the United States? Without reliable data on place of manufacture, policymakers lack empirical grounding for debates over domestic preference policy, trade agreement implementation, and supply-chain resilience. Assertions about reshoring, domestic industrial capacity, or foreign sourcing exposure cannot be meaningfully evaluated in the absence of consistent, government-wide reporting.

Transparency and accountability in federal procurement are legitimate governmental objectives that fall squarely within the PRA’s concept of “practical utility.” Federal acquisition represents hundreds of billions of dollars annually, and taxpayers are entitled to clarity regarding how those funds are deployed. Data that enables Congress, executive branch officials, and the public to assess the geographic distribution of manufacturing tied to federal contracts supports oversight, informs legislative refinement, and strengthens institutional credibility.

CRF therefore recognizes that the reporting requirement under FAR 52.225-18 can serve an important public policy function. However, that function is realized only if the data collected is accurate, consistently defined, non-duplicative of other procurement reporting mechanisms, and actively analyzed. Information collected but not meaningfully used does not satisfy the PRA’s practical utility standard. Likewise, redundant data entry that replicates information already captured elsewhere risks undermining proportionality without enhancing insight.

In this comment, CRF urges the Office of Management and Budget and the FAR Councils to ensure that the reporting requirement is modernized and integrated within existing procurement data systems. Opportunities for harmonization with Buy American certification data, automation of reporting fields, and standardized interpretation of “predominantly manufactured” should be explored to enhance both accuracy and administrative efficiency. In addition, periodic public

reporting of aggregate sourcing data would strengthen transparency and demonstrate the tangible value of the collection.

Ultimately, this proceeding should be understood not as a debate over the merits of domestic preference policy, but as a question of data integrity and administrative discipline. When properly designed and effectively used, place-of-manufacture reporting can improve accountability and inform evidence-based policymaking. When poorly integrated or duplicative, it risks becoming an administrative formality detached from measurable benefit. The PRA provides the framework for ensuring that the former outcome prevails.

Executive Summary

The CPAC Foundation's Center for Regulatory Freedom (CRF) supports renewal of the information collection associated with FAR 52.225-18, *Place of Manufacture*, because it serves a legitimate and important transparency function within federal procurement. Unlike substantive Buy American certification regimes, this collection operates as a data-reporting mechanism that enables policymakers to assess sourcing patterns across the federal acquisition system. When properly implemented, integrated, and used, the data collected under this provision provides meaningful insight into how federal procurement dollars are distributed between domestic and foreign manufacturing sources. At the same time, the Paperwork Reduction Act (PRA) requires that this reporting demonstrate practical utility, avoid duplication, and remain proportionate to its policy objectives.

CRF offers the following observations and recommendations:

- **The reporting requirement answers a legitimate public policy question.** Measuring the extent to which federal procurement spending supports domestic versus foreign manufacturing is a foundational oversight inquiry that warrants systematic data collection.
- **FPDS data enables measurement of foreign vs. domestic sourcing.** Entry of place-of-manufacture information into the Federal Procurement Data System provides a government-wide dataset capable of informing congressional oversight, executive policy review, and trade analysis.
- **Transparency strengthens Buy American oversight.** Reliable sourcing data enhances the credibility of domestic preference policies by grounding public debate and legislative refinement in empirical evidence rather than anecdote.
- **Data must have demonstrable practical utility.** Under the PRA, information collections must be actively used, consistently interpreted, and meaningfully analyzed; data that is merely recorded but not synthesized or reported undermines the justification for the burden imposed.
- **Duplication with Buy American certification regimes should be avoided.** To the extent that related information is already captured under OMB Control No. 9000-0024 or other certification provisions, agencies should ensure that this reporting requirement does not create redundant data entry obligations.
- **Auto-population and harmonization of procurement data systems should be prioritized.** Integration between certification systems and FPDS reporting fields can reduce administrative burden, improve accuracy, and minimize the risk of inconsistent representations.

- **Periodic public reporting dashboards should be developed.** Publishing aggregated data on foreign versus domestic sourcing would enhance accountability, demonstrate the value of the collection, and reinforce public confidence in procurement oversight.
- **Proportionality and technological modernization are essential.** Agencies should regularly reassess burden estimates, standardize definitions, and employ automated collection tools to ensure that the reporting requirement remains efficient and administratively disciplined.
- **Disciplined data collection strengthens domestic preference policy.** Transparent, accurate, and well-integrated reporting enhances—rather than weakens—the effectiveness and legitimacy of Buy American frameworks by ensuring that policy debates rest on measurable outcomes.

In sum, CRF believes that the reporting requirement under FAR 52.225-18 can serve an important accountability function within federal procurement. Renewal is warranted where the data collected is demonstrably useful, technologically integrated, and free from unnecessary duplication. Disciplined transparency—grounded in the PRA’s principles of practical utility and proportionality—will strengthen both procurement oversight and the long-term credibility of domestic sourcing policy.

I. The Collection Serves a Legitimate and Important Public Policy Purpose

The information collection associated with FAR 52.225-18, *Place of Manufacture*, operates within a defined statutory and regulatory framework governing domestic preference policy and federal procurement transparency. The provision requires offerors of manufactured end products to indicate whether those products are predominantly manufactured in the United States or outside the United States. Although the reporting mechanism is limited in scope, it serves as a structured representation that feeds government-wide acquisition data systems and supports broader policy evaluation.

The checkbox representation required under FAR 52.225-18 is entered into the Federal Procurement Data System (FPDS), which functions as the central repository for procurement data across federal agencies. FPDS data is used to analyze spending patterns, generate reports for Congress and executive agencies, and inform oversight of acquisition practices. By capturing place-of-manufacture information at the solicitation stage, the collection enables systematic aggregation of sourcing data across the federal procurement portfolio.

At a macro level, the data collected through this reporting requirement helps answer a fundamental policy question: what percentage of federal procurement dollars is associated with products manufactured outside the United States? This question is neither abstract nor ideological. It goes directly to the operational consequences of domestic preference statutes, trade agreements, and agency acquisition strategies. Without reliable data on manufacturing location, policymakers lack a baseline for evaluating whether procurement outcomes align with stated domestic sourcing objectives.

Procurement sourcing data also intersects with national security and supply-chain resilience considerations. Federal acquisition decisions shape industrial capacity in sectors ranging from defense-related manufacturing to critical infrastructure and emerging technologies. Understanding the extent of reliance on foreign manufacturing for federally procured goods

informs assessments of supply-chain vulnerabilities, geopolitical exposure, and domestic production capacity. Place-of-manufacture reporting contributes to this strategic visibility.

Congressional oversight further depends on reliable sourcing data. Legislative bodies routinely examine the implementation of Buy American statutes, trade agreement obligations, and waiver authorities. FPDS data generated through this collection allows Congress to assess trends, identify anomalies, and evaluate whether statutory frameworks are producing intended results. Absent consistent reporting, oversight becomes reactive and anecdotal rather than data-driven.

The information is also relevant to trade agreement analysis and waiver evaluation. Federal procurement is shaped by a network of international trade commitments and statutory exceptions. Aggregated place-of-manufacture data enables policymakers to assess how frequently foreign manufacturing is utilized in practice and under what circumstances. This information supports informed evaluation of trade policy impacts and the scope of waiver utilization within the procurement system.

More broadly, policy debates over domestic sourcing, reshoring initiatives, and industrial policy require empirical grounding. Assertions regarding the prevalence of foreign sourcing or the effectiveness of domestic preference reforms must be evaluated against measurable data. The reporting requirement under FAR 52.225-18 contributes to a dataset capable of informing these debates with objective evidence rather than speculation.

Without this reporting, policymakers would operate with limited visibility into procurement sourcing patterns. Agencies could track contract obligations and total spending, but the geographic dimension of manufacturing would remain opaque at the aggregate level. Such opacity would weaken the government's ability to assess policy performance and diminish transparency in a domain involving substantial taxpayer expenditures.

It is important to clarify that transparency in this context is informational rather than punitive. The reporting requirement does not, by itself, impose eligibility restrictions or enforcement consequences. Instead, it provides a mechanism for understanding procurement outcomes. Transparency enhances accountability without presuming wrongdoing, and it strengthens institutional credibility by allowing outcomes to be measured and evaluated.

For these reasons, the information collection associated with FAR 52.225-18 satisfies the PRA's "practical utility" standard in principle. The data collected addresses a legitimate governmental objective, supports oversight and policy evaluation, and contributes to evidence-based decision-making. The remaining inquiry under the PRA concerns implementation—ensuring that the collection remains accurate, non-duplicative, and effectively integrated—but its foundational policy purpose is sound.

II. Practical Utility Depends on Data Quality and System Integration

While the reporting requirement under FAR 52.225-18 serves a legitimate public policy purpose in principle, the Paperwork Reduction Act requires more than theoretical usefulness. The PRA mandates that information collections demonstrate "practical utility," meaning that the information must be actively used in a way that informs agency functions and policymaking.

Data that is collected but not analyzed, synthesized, or relied upon in decision-making does not satisfy this standard, regardless of the policy aspirations behind it.

Accordingly, a central question for this renewal is how the place-of-manufacture data entered into the Federal Procurement Data System is analyzed and reported. Is the data routinely aggregated and reviewed? Are sourcing trends evaluated across agencies and over time? Are reports generated to inform leadership decisions, congressional briefings, or policy development? If the data remains largely dormant within FPDS, its practical utility—and therefore its PRA justification—becomes attenuated.

Information that is recorded but not meaningfully synthesized risks becoming an administrative formality rather than a governance tool. The value of this reporting requirement depends on whether it produces actionable insight. Aggregated analysis of foreign versus domestic sourcing patterns, sector-specific trends, and year-over-year shifts would demonstrate that the burden imposed on offerors yields measurable benefit. Absent such synthesis, the collection risks imposing compliance costs without delivering corresponding transparency gains.

To ensure that the data achieves its intended purpose, standardized coding and consistent data-entry practices across agencies are essential. Variations in interpretation or inconsistent FPDS coding can distort aggregate results and undermine comparability. Clear, uniform instructions for data entry—supported by training and validation protocols—would enhance reliability and enable meaningful cross-agency analysis.

Particular attention should be given to the interpretation of the phrase “predominantly manufactured.” Without harmonized guidance, offerors may apply differing thresholds or methodologies in determining whether a product is predominantly manufactured in the United States or abroad. Inconsistent interpretations can lead to data anomalies that weaken analytical value. Providing clarified definitions or standardized interpretive guidance would improve both accuracy and comparability.

CRF therefore recommends harmonized guidance that reduces ambiguity while preserving administrative simplicity. Agencies should ensure that the definition applied in reporting aligns with related procurement definitions to the greatest extent feasible. Reducing interpretive variability will improve data integrity and enhance the credibility of aggregate sourcing statistics derived from FPDS.

Routine interagency reporting of sourcing metrics would further demonstrate practical utility. Periodic summaries—whether annual or semiannual—highlighting the percentage of contract obligations associated with foreign-manufactured end products would operationalize the data collection. Such reporting would make the information visible to policymakers and agency leadership, reinforcing its accountability function.

Integration with Government Accountability Office analyses and congressional reporting processes should also be encouraged. GAO reviews and legislative oversight frequently address domestic preference implementation and trade policy impacts. Reliable, standardized FPDS data would strengthen these reviews and reduce the need for ad hoc data requests. Institutionalizing the use of place-of-manufacture data in oversight processes would solidify its PRA justification.

Improved system integration enhances policymaking by ensuring that procurement transparency informs strategic decisions rather than remaining siloed within acquisition databases. When data is interoperable, consistently coded, and regularly reported, it can inform supply-chain assessments, domestic industrial policy discussions, and legislative refinement. Integration transforms raw reporting into actionable governance intelligence.

In sum, the practical utility of this collection depends on more than the act of checking a box. Utility is realized through accuracy, harmonization, and visible use. Transparency, when supported by standardized systems and active reporting, strengthens procurement oversight and policy coherence. Ensuring data quality and integration will maximize the value of this collection while satisfying the PRA's requirement that burdens imposed on the public produce demonstrable benefit.

III. Avoiding Duplication With Buy American Certification Architecture

CRF recognizes that the reporting requirement under FAR 52.225-18 operates alongside broader Buy American and trade agreement certification frameworks, including those covered under OMB Control No. 9000-0024. While the two collections serve distinct functions—one focused on compliance verification and the other on sourcing data reporting—they nonetheless occupy adjacent regulatory space. The proximity of these regimes warrants careful scrutiny to ensure that they do not create unnecessary duplication.

In many procurements, contractors already provide detailed origin representations and certifications to comply with Buy American Act and Trade Agreements Act requirements. These representations may include country-of-origin determinations, domestic content calculations, and eligibility disclosures. To the extent that place-of-manufacture information is embedded within those certifications, agencies should examine whether the FAR 52.225-18 reporting requirement requires contractors to restate information that has already been provided elsewhere in the acquisition process.

This raises a practical question under the Paperwork Reduction Act: does the reporting requirement result in duplicative data entry that could be avoided through system integration? Even when the burden of checking a box appears minimal in isolation, repeated manual reporting across large volumes of procurements can generate cumulative compliance costs. The PRA directs agencies to consider not only the burden of a single collection, but also the aggregate impact of overlapping requirements.

CRF therefore encourages exploration of auto-population mechanisms that draw place-of-manufacture data from existing certification systems where appropriate. If contractors have already submitted origin representations through standardized procurement platforms, the reporting field within FPDS should, to the greatest extent feasible, be populated through interoperable digital systems rather than requiring redundant manual input. Such integration would preserve the informational objective while reducing administrative friction.

Centralized digital reporting platforms further support this objective. Modern procurement systems are capable of linking solicitation responses, certifications, and data-reporting fields within a unified interface. Leveraging these capabilities would reduce the risk of inconsistent entries, improve accuracy, and lower the marginal burden associated with each additional

reporting requirement. Administrative modernization is consistent with both procurement efficiency and PRA proportionality.

The cumulative burden imposed by overlapping certification and reporting regimes should not be underestimated. While each individual representation may appear modest, contractors—particularly small and mid-sized firms—must devote time and compliance resources to reviewing, validating, and submitting information across multiple FAR provisions. Over time, layered requirements can compound into measurable administrative cost. The PRA’s proportionality mandate exists to prevent such cumulative burden from outpacing demonstrable utility.

Duplication weakens proportionality by imposing additional steps without generating additional insight. If the same underlying data is captured multiple times through separate processes, the incremental policy benefit of repetition may be negligible. Agencies should therefore examine whether the reporting requirement can be streamlined through consolidation or integration with existing certification architectures, thereby ensuring that each data element is collected once and used effectively.

Importantly, modernization and harmonization do not require retreat from transparency objectives. To the contrary, integrated systems can enhance data accuracy and accessibility while reducing unnecessary burden. Aligning reporting fields, standardizing definitions, and enabling digital interoperability can produce a more coherent procurement data environment that serves both accountability and efficiency.

Harmonization across Buy American certification and reporting mechanisms ultimately strengthens administrative coherence. When information collections are coordinated, non-duplicative, and technologically integrated, they reinforce each other’s objectives rather than creating parallel and potentially redundant structures. Such coherence advances the PRA’s core principles and ensures that transparency in procurement is achieved through disciplined, efficient administrative design.

IV. Transparency, Accountability, and Public Trust

Federal procurement transparency is not merely an administrative preference; it is a core component of democratic accountability. The federal government obligates hundreds of billions of taxpayer dollars annually through the acquisition system. Citizens, policymakers, and oversight institutions have a legitimate interest in understanding how those funds are deployed, including whether they support domestic manufacturing or flow to products manufactured abroad. Information collected under FAR 52.225-18 contributes to that visibility.

Taxpayer visibility into sourcing decisions is particularly salient in the context of domestic preference policy. Buy American statutes and related procurement frameworks are frequently justified on grounds of supporting domestic industry, strengthening supply chains, and promoting economic resilience. Transparent reporting of place-of-manufacture data allows the public and elected officials to assess whether procurement outcomes align with those stated objectives. Without such visibility, accountability becomes difficult to sustain.

Transparency also reinforces public confidence in the enforcement and implementation of Buy American policies. When reliable data demonstrates the scope and trajectory of domestic versus foreign sourcing, debates over compliance can be grounded in measurable outcomes rather than isolated anecdotes. Clear, aggregated reporting helps dispel misconceptions and reduces the risk that public discourse becomes disconnected from empirical reality.

Data-driven debate is particularly important in an area often shaped by strong ideological narratives. Claims that federal procurement overwhelmingly favors foreign manufacturing—or conversely, that domestic sourcing requirements are universally effective—can be tested against objective metrics when consistent data is available. The existence of a transparent dataset promotes disciplined policy analysis and reduces the likelihood that reforms are driven by incomplete or distorted information.

Reliable sourcing data also reduces the risk of reactive policymaking. In the absence of comprehensive reporting, policy responses may be triggered by isolated incidents or limited case studies. Systematic data collection allows trends to be evaluated over time, enabling more calibrated legislative and regulatory adjustments. Measured transparency supports strategic governance rather than episodic intervention.

CRF therefore encourages consideration of public-facing dashboards or annual summary reports that present aggregated sourcing metrics in accessible form. Publishing high-level data on the proportion of contract obligations associated with domestic versus foreign manufacturing would demonstrate the tangible utility of the reporting requirement. Such transparency would also reinforce the accountability rationale that underpins the PRA justification for this collection.

Transparency in procurement sourcing further intersects with national resilience and economic competitiveness. Policymakers evaluating supply-chain vulnerabilities, industrial capacity, and strategic dependencies benefit from clear insight into manufacturing geography tied to federal contracts. Visible data strengthens the analytical foundation for decisions affecting national security and economic strategy.

Ultimately, visibility enhances institutional legitimacy. When procurement outcomes are measurable and publicly reported, confidence in the integrity of the acquisition system increases. Transparency affirms that domestic preference policies are subject to scrutiny and evaluation rather than rhetorical assertion. By reinforcing accountability and informed debate, place-of-manufacture reporting contributes to the credibility and resilience of federal procurement governance.

V. Administrative Efficiency and Technological Modernization

Ensuring the continued practical utility of the FAR 52.225-18 reporting requirement requires parallel attention to administrative efficiency and technological modernization. While the individual reporting act—a checkbox representation—may appear minimal, its repetition across hundreds of thousands of transactions annually justifies examination of whether the process can be further streamlined through automation. Agencies should prioritize automated reporting fields within procurement platforms to minimize manual entry and reduce the potential for clerical inconsistencies.

Interoperability between the Federal Procurement Data System and existing certification systems should be a central objective. Where contractors already provide country-of-origin or domestic content information through standardized procurement portals, those data elements should, to the greatest extent feasible, populate FPDS fields automatically. Integrated systems reduce redundant steps, enhance consistency across records, and improve overall data reliability. Administrative coherence is strengthened when related information flows seamlessly between platforms.

Reducing manual input burden not only advances efficiency but also improves data quality. Each additional manual reporting step introduces the possibility of transcription error, inconsistent interpretation, or incomplete entry. By leveraging structured digital forms and system-driven validation checks, agencies can decrease the likelihood of discrepancies while lowering the time required for compliance. Such modernization aligns directly with the Paperwork Reduction Act's directive to minimize burden consistent with practical utility.

CRF also encourages consideration of portfolio-level updates in appropriate circumstances. For contractors that consistently supply the same manufactured end products with unchanged manufacturing locations, the procurement system could allow periodic confirmation rather than repetitive re-entry of identical information for each solicitation. Where factual circumstances have not materially changed, streamlined affirmation mechanisms could preserve transparency while reducing unnecessary repetition.

Periodic review of burden-hour estimates is equally important. The PRA framework requires agencies to reassess whether previously estimated burdens remain accurate as procurement practices and digital systems evolve. As automation and integration improve, reported burden hours should reflect these efficiencies. Conversely, if contractors experience unanticipated administrative complexity, burden estimates should be adjusted accordingly to maintain analytical integrity.

Pilot programs designed to test digital harmonization strategies could provide valuable insight before broader system-wide implementation. Agencies might explore limited-scope initiatives integrating certification and reporting data streams, evaluating impacts on accuracy, processing time, and contractor burden. Measured experimentation allows refinement of technical solutions while preserving data continuity.

Technological modernization also enhances accuracy. Structured data fields, standardized definitions, and automated cross-checks reduce ambiguity and improve comparability across agencies. When reporting processes are streamlined and digitally integrated, the resulting dataset becomes more reliable and analytically valuable. Modern systems can simultaneously lower burden and raise data quality.

Efficiency and transparency are not competing objectives. Well-designed digital integration can preserve the informational value of place-of-manufacture reporting while reducing administrative friction. By investing in automation, interoperability, and periodic burden reassessment, agencies can ensure that this collection continues to serve its accountability purpose in a manner consistent with the PRA's principles of proportionality and disciplined governance.

Conclusion

CRF reaffirms its longstanding support for domestic preference policies that promote American manufacturing capacity, strengthen supply-chain resilience, and reinforce national economic competitiveness. Buy American statutes and related procurement frameworks play an important role in aligning federal acquisition with broader economic objectives. Transparent implementation of these policies enhances their legitimacy and long-term effectiveness.

Measuring the extent to which federal procurement spending is associated with foreign-manufactured end products is a legitimate and necessary component of responsible governance. Policymakers cannot meaningfully evaluate domestic preference outcomes without reliable data regarding sourcing patterns. The reporting requirement under FAR 52.225-18 contributes to answering that question and, when properly implemented, provides visibility that supports informed oversight.

Data-driven governance strengthens policy by replacing conjecture with measurable evidence. Aggregated place-of-manufacture information allows Congress and executive agencies to evaluate trends, assess the impact of trade agreements and waivers, and calibrate future reforms. Transparent metrics reduce the likelihood of reactive policymaking and instead support deliberate, evidence-based adjustments to procurement policy.

At the same time, the Paperwork Reduction Act requires that information collections demonstrate practical utility, proportionality, and demonstrable use. Renewal of this collection is justified where the data is actively analyzed, consistently interpreted, and integrated into oversight processes. Data that is duplicative, inconsistently applied, or insufficiently utilized would undermine that justification. PRA discipline therefore remains essential.

CRF reiterates the importance of avoiding unnecessary duplication with existing Buy American certification regimes. Where related origin information is already collected, agencies should ensure that reporting systems are harmonized and interoperable rather than layered. Coordinated data architecture preserves transparency while minimizing cumulative compliance burden.

Modernization and technological harmonization should be prioritized to strengthen both efficiency and data quality. Automated reporting fields, interoperability between procurement systems, and standardized guidance will reduce manual input burden and enhance accuracy. Periodic reassessment of burden estimates and system performance will further ensure that the collection remains proportionate to its policy value.

Procurement transparency also intersects directly with national economic security. Understanding where federally procured goods are manufactured informs assessments of industrial capacity, supply-chain vulnerabilities, and strategic dependencies. Reliable data supports a more resilient and competitive domestic economy, reinforcing the national interests that domestic preference policies seek to advance.

Transparency and efficiency are not mutually exclusive objectives. A well-integrated, technologically modern reporting framework can simultaneously enhance visibility and reduce administrative friction. By aligning transparency with disciplined PRA application, agencies can ensure that this collection strengthens procurement accountability without imposing unnecessary burden.

CRF stands ready to engage constructively with the Office of Management and Budget, the FAR Councils, and other stakeholders to ensure that this reporting requirement remains accurate, proportionate, and effectively integrated. Lawful, economically grounded, and accountability-focused procurement reform depends on disciplined data collection that delivers measurable public benefit.

Sincerely,

A handwritten signature in black ink that reads "Andrew M. Langer". The signature is written in a cursive, flowing style.

Andrew M. Langer
Director
CPAC Foundation Center for Regulatory Freedom