

SUPPORTING STATEMENT – PART A

Defense Federal Acquisition Regulation Supplement (DFARS) Part 204, Administrative Matters, and Related Clause at 252.204; OMB Control Number 0704-0225

Summary of Changes from Previously Approved Collection

- Increase in burden due to an increase in the number of responses and respondents.
- Increase in cost per hour due to use of current labor rates.

1. Need for the Information Collection

DFARS 204.404-70(a) prescribes the use of the clause at DFARS 252.204-7000, Disclosure of Information, when the contractor will have access to or generate unclassified information that may be sensitive and inappropriate for release to the public. This clause requires contractors to obtain contracting officer approval to release unclassified information outside of the contractor's organization, unless the information is already in the public domain or part of a project determined in writing to be fundamental research in accordance with certain agency directives and memoranda. In requesting such approval, the contractor must identify the specific information that will be released, the medium that will be used, and the purpose of the release.

2. Use of the Information

Upon receipt of a contractor's request, the Government reviews the information provided by the contractor to determine if it is sensitive or otherwise inappropriate for release for the stated purpose. These requests for disclosure are typically only received on research and development contracts or large dollar systems or operations contracts.

3. Use of Information Technology

Information technology is used 100% of the time to reduce burden.

4. Non-duplication

As a matter of policy, DoD reviews the Federal Acquisition Regulation (FAR) to determine if adequate language already exists. The language in DFARS part 204 applies solely to DoD and is not considered duplicative of the language in FAR part 4. Since the nature of the reporting requirement is contract specific, similar information is not readily available.

5. Burden on Small Business

The collection of this information is not expected to have a significant impact on a substantial number of small businesses or other small entities. The requirements for this information collection are determined on a case-by-case basis, as the circumstances dictate. The

burden applied to small businesses is the minimum consistent with applicable laws, Executive orders, and prudent business practices.

6. Less Frequent Collection

The nature of the reporting requirement is contract specific and the information is not readily available elsewhere; therefore, collection is required on a case-by-case basis pursuant to the contract clause requirements. The consequences of not collecting this data or collecting the data less frequently are: (1) impairment to the effective and efficient management of releasable information by DoD public affairs, and (2) the technical, legal, and security ramifications associated with the disclosure of unclassified information that is sensitive and inappropriate for release to the public.

7. Paperwork Reduction Act Guidelines

There are no special circumstances for collection. Collection of this information is consistent with the guidelines at 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

a. Public Notice

i. Public comments were solicited in a 60-day notice for the collection, which was published in the *Federal Register* on May 29, 2026 (91 FR 32015). Two comments were received; one comment was unrelated to this information collection. A summary of the other comment, as well as DoD's response, is included below:

Comment: The respondent commented that this information collection is no longer necessary for the proper performance of DoD's functions, and that it is duplicative of other reporting, which is more tailored to DoD's legitimate concerns about distribution of unclassified information requiring controls. The respondent noted that the restrictions this information collection places on unclassified information are redundant due to DoD Instruction 5200.48, Controlled Unclassified Information (CUI), and FAR Case 2026-001, Revolutionary Federal Acquisition Regulation Overhaul Parts 1, 2, 4, 33, 39, 40, and 53. Regarding information that is not CUI, the respondent stated that restrictions on disclosure of unclassified information, specifically technical data, are contrary to 10 U.S.C. 3771(a)(2).

Response: DoD is considering revisions to the clause associated with this information collection as part of the implementation of Executive Order 14265, which requires the elimination or revision of any unnecessary supplemental regulations. The statute at 41 U.S.C. 1707 requires publication of revisions to the clause for public comment. Therefore, such revisions cannot be made as part of the renewal of this information collection but will be considered for inclusion in a separate rulemaking action.

ii. A 30-day notice for the collection was published in the *Federal Register* on July 31, 2026 (91 FR 48376).

b. Consultation

A DoD subject matter expert reviewed the validity of the information collection requirements of the clause to provide updated estimates of the public burden. The burden, included in item 12 below, reflects the validation of the need for the collection requirement, judgment, and best estimates of the DoD subject matter specialist.

9. Gifts or Payment

DoD will not provide a payment or gift to respondents of this information collection requirement, other than remuneration to contractors under their contracts.

10. Confidentiality

This information is disclosed only to the extent consistent with statutory requirements, current regulations, and prudent business practices. 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. The collection of information does not include any personally identifiable information (PII) and records are not retrievable by PII; therefore, no Privacy Impact Assessment or System of Records Notice is required.

11. Sensitive Questions

No sensitive questions are involved in the information collection.

12. Respondent Burden and its Labor Costs

a. Estimation of Respondent Burden

According to data obtained from Electronic Document Access (EDA), DoD awarded an average of 4,151 new awards in fiscal year (FY) 2023 through FY 2025 that contain the DFARS clause 252.204-7000. These 4,151 new awards were made to an average of 2,801 unique entities. The data exclude contracts awarded under FAR part 12 procedures for commercial products and commercial services, contracts for research, task orders and delivery orders, and awards below the simplified acquisition threshold. Based on prior history and reporting, DoD estimates that 10 percent of new contract actions that include DFARS clause 252.204-7000 will respond to the reporting requirement. Using the information above, the number of respondents is calculated as 280 ($2,801 * 0.10 = 280.1$), and the number of responses is calculated as 415 ($4,151 * 0.10 = 415.1$).

The estimate of hours spent developing and submitting a request is based on estimates from contracting professionals familiar with processing requests for release of unclassified information. We estimate the total cost as follows:

Estimation of Respondent Burden Hours: 252.204-7000	
Number of respondents	280
Number of responses per respondent	1.48
Number of total annual responses	415
Hours per response	3
Annual respondent burden hours	1,245

b. Labor Cost of Respondent Burden

Based on the salary table for GS-9/step 5 hourly rate for the Rest of U.S. locality area for 2026 (\$33.52 an hour for base salary) plus 36.25 percent burden ($\$33.52 * 0.3625 = \12.15), is \$45.67 rounded to the nearest dollar, to \$46. The burden rate used is that mandated by OMB memorandum M-08-13 for use in public-private competition. (Reference Salary Table 2026-RUS, Effective January 2026, found at www.opm.gov).

Labor Cost of Respondent Burden: 252.204-7000	
Number of total annual responses	415
Hours per response	3
Cost per hour (hourly wage)	\$46
Labor burden per response	\$138
Annual labor burden	\$57,270

13. Respondent Costs Other Than Burden Hour Costs

It is not anticipated that the information collection will generate any additional annualized costs to respondents other than the labor burden costs addressed in Item 12.

14. Cost to the Federal Government

In the table below, the number of responses is based on the same information and calculated in the same manner as discussed in Item 12. The estimate of hours spent reviewing and processing a request is based on estimates from contracting professionals familiar with processing requests for release of unclassified information.

Based on the salary table for GS-9/step 5 salary (\$33.52 an hour for base salary) plus 36.25 percent burden, rounded to the nearest dollar, or \$46 an hour. The burden rate used is that mandated by OMB memorandum M-08-13 for use in public-private competition. (Reference Salary Table 2026-GS, Effective January 2026, found at www.opm.gov).

Labor Cost to the Federal Government: 252.204-7000	
Number of total annual responses	415
Hours per response	2
Cost per hour (hourly wage)	\$46
Cost per response	\$92
Total cost	\$38,180

15. Reasons for Change in Burden

The number of respondents and responses has changed due to use of current data. The cost per hour increased from \$42 to \$46 per hour because the Office of Personnel Management has increased the GS hourly wage for a GS-9, step 5 employee since 2023. The following chart shows the changes in burden from 2023 to the updated 2026 estimates.

0704-0225	2023	2025	Change
Number of respondents	236	280	44
Responses per respondent	1.56	1.48	-0.08
Number of responses	369	415	46
Hours per response	3	3	—
Estimated hours	1,107	1,245	138
Cost per hour	\$42	\$46	\$4
Annual public burden	\$46,494	\$57,270	\$10,776

16. Publication of Results

Results of this collection will not be published.

17. Non-Display of OMB Expiration Date

DoD does not seek approval to not display the expiration date for OMB approval of the information collection.

18. Exceptions to “Certification for Paperwork Reduction Submissions”

There are no exceptions to the certification accompanying this Paperwork Reduction Act submission.