

Federal Acquisition Regulation (FAR)
Privacy Training
OMB Control No. 9000-0182
Justification - Part A Supporting Statement

FAR section affected: 52.224-3

Overview of Information Collection:

- This justification supports clearance of an extension of the collection.

There are no program changes. The FAR requirements remain the same. This extension includes adjustments to the burden due to use of the latest procurement data available in the System for Award Management (SAM) at SAM.gov (formerly FPDS.gov), the calendar year 2026 Office of Personnel Management (OPM) General Schedule (GS) wage rates for the rest of the United States, and a different set of assumptions as explained in item 15 of this supporting statement.

1. Need & Method for the Information Collection. This clearance covers the information that contractors must submit to comply with the following FAR requirements:

- FAR 52.224-3(d). This clause requires contractors to:

(a) Maintain a record of initial and annual privacy training, for the contractor's employees that: (i) have access to a system of records; (ii) create, collect, use, process, store, maintain, disseminate, disclose, dispose, or otherwise handle personally identifiable information (PII) on behalf of an agency; or (iii) design, develop, maintain, or operate a system of records; and

(b) Provide documentation of completion of such privacy training to the contracting officer if requested.

2. Use of the Information. The contracting officer will use the information in contract administration and to establish that all applicable contractor and subcontractor employees comply with the privacy training requirements.
3. Use of Information Technology. Federal agencies use information technology to the maximum extent practicable. Where both the Government agency and contractors are capable of electronic interchange, the contractors may submit this

information collection requirement electronically.

4. Non-duplication. These requirements are issued under the FAR, which has been developed to standardize Federal procurement practices and eliminate unnecessary duplication.
5. Burden on Small Business. The burden applied to small businesses is the minimum consistent with applicable laws, Executive orders, regulations, and prudent business practices.
6. Less Frequent Collection. Collection of information on a basis other than contract-by-contract is not practical.
7. Paperwork Reduction Act Guidelines. Collection is consistent with guidelines in 5 CFR 1320.5(d)(2).
8. Consultation and Public Comments.
 - A. A 60-day notice was published in the *Federal Register* at 91 FR 30305, on May 22, 2026.
 - B. A 30-day notice was published in the *Federal Register* at 91 FR 52694, on August 14, 2026.
9. Gifts or Payment. This collection does not provide any payment or gift to respondents, other than remuneration of contractors.
10. Privacy & Confidentiality. This information is disclosed only to the extent consistent with prudent business practices, current regulations, and statutory requirements.
11. Sensitive Questions. No sensitive questions are involved.
12. Burden Estimate.

Summary of Annual Cost to the Public	Estimated respondents /yr	Responses/ respondent	Total annual responses	Estimated hrs/respondent	Estimated total burden hrs	Hourly rate	Estimated annual cost to the public
Reporting Burden	107+	1	107	0.25	27	\$50	\$1,338
Recordkeeping Burden	4,282	6	25,692	0.50	12,846	\$50	\$642,300
Total annual cost to the public	4,282		25,799		12,873		\$643,638

+ This is a subset of the recordkeepers.

For purposes of this information collection, it is assumed that

only the Product Service Codes (PSCs) referenced below, would potentially be affected by the clause at FAR 52.224-3. These PSCs are non-product-based PSCs that have access to a system of records; create, collect, use, process, store, maintain, disseminate, disclose, dispose, or otherwise handle PII; or design, develop, maintain, or operate a system of records. It is further assumed that only a certain number of potentially affected contractors will actually be affected, in this case 10 percent. When creating the pool of potentially affected contractors, it is a generally accepted convention that there are two subcontractors for every prime contractor (2:1 ratio); that convention is utilized herein.

The following estimates are based on averages of historical award data available in SAM.gov for fiscal years 2023 through 2025 for the following PSCs:

Product Service Codes (PSCs)	
Category	Description
B	Special Studies/Analysis, Not R&D
D	Information Technology and Telecommunications
G	Social
Q	Medical
R	Support (Professional/Administrative/Management)
U	Education/Training

Total Public Recordkeeping Burden

Examination of this data reveals that the number of unique entities that received new contract awards in the targeted PSCs is 14,274 (annual average for fiscal years 2023 through 2025).¹ The number of potential subcontractors is 28,548 (14,274 unique entities x 2). Therefore, the total pool of affected contractors is 42,822 (14,274 prime contractors plus 28,548 subcontractors). The recordkeeping requirements associated with the clause will apply to a limited number (10 percent) of contractors. The estimated number of contractors (recordkeepers) that will be impacted by this rule is approximately 4,282 (42,822 X .10). The estimated hourly burden expended per recordkeeper per contract award is 3 hours (6 records per record keeper X .50 (30 minutes) per record). The estimated annual recordkeeping burden is calculated as follows:

¹ SAM filters used {Date Signed} (ID) Between 10/1/2022 and 9/30/2025 And {Modification Number} (ID) = "0" And {Product or Service Code} (ID) Not Between "1000" and "9999" And {Product or Service Code} (ID) Begins with "B, D, G, Q, R, U" And {Award or IDV Type} <> BPA CALL, DELIVERY ORDER And {Base and All Options Value (Total Contract Value)} > 15000

Recordkeeping

Recordkeepers/yr.....	4,282
Records per recordkeeper.....	x 6
Total annual records	25,692
Review hours/record.....	x 0.5
Annual recordkeeping burden hours.....	12,846
Hourly rate*.....	x \$50
Annual recordkeeping burden cost to the public..	\$642,300

Total Public Reporting Burden

The public reporting burden is associated with the occasional request by the contracting officer for the contractor to provide documentation of completion of privacy training by the contractor's staff. Referring back to the total number of recordkeepers, 4,282, it is estimated that approximately 2.5 percent (2.5%) will be required to submit completion documentation. The total number of respondents that annually will be required to submit training completion documentation is 107 (4,282 X .025). The preparation time associated with this effort is 0.25 hours (15 minutes) per submission (report). The calculation for annualized public reporting cost is as follows:

Reporting

Estimated number of respondents/yr.....	107
Responses per respondent.....	x 1
Total annual responses.....	107
Estimated hrs/response.....	x 0.25
Estimated annual burden hours.....	27
Hourly rate*.....	x \$50
Estimated annual cost to the public.....	\$ 1,338

Note:

The hourly rate is calculated by applying a 36.25 percent fringe factor and a 12 percent overhead factor to a base hourly rate and then rounding to the nearest whole dollar. The base hourly rate is derived from the OPM 2026 GS Locality Pay Table for the rest of the U.S. ("Salary Table 2026-RUS"). The fringe factor is derived from OMB memorandum M-08-13. The overhead factor is derived from the OMB Circular No. A-76 Revised Supplemental Handbook.

* For a GS-9/step 5, the base hourly rate is \$33.52 and loaded rounding to the nearest whole dollar is \$50.

13. Estimated nonrecurring costs. Not applicable.

14. Estimated cost to the Government.

Estimated responses/yr.....	107
Reviewing time (hr)/response.....	<u>x 1</u>
Review time /yr.....	107
Hourly rate*.....	<u>x \$50</u>
Estimated annual cost to the Government.....	\$5,350

15. Reasons for changes. There are no program changes. The FAR requirements remain the same. This extension includes adjustments to the public and Government burden estimates based on the following:

- The estimated number of respondents and responses per year is based on the historical average award data available in SAM.gov for fiscal years 2023 through 2025.
- The estimated cost per hour is based on use of the calendar year 2026 OPM GS wage rate for the rest of the United States.
- Subject matter experts (SMEs) examined previous assumptions used to calculate the burden and agreed that access to PII or system of records impacts a much more limited set of contractors. As such the burden estimate was adjusted by reducing:
 - The percentage of the target population (contracts in the PSC categories) from 33.25% to 10%.
 - The PSC categories used for calculating the burden estimate from 14 to 6. The following PSC categories were removed from the data set: A-Research and Development; C-Architect and Engineering Services; H-Quality Control, Testing, and Inspection; J-Maintenance, Repair, and Rebuilding of Equipment; K-Modification of Equipment; L-Technical Representative; M-Operation of Structures/Facilities; and N-Installation of Equipment. SMEs concluded that the previously used categories "wildly exceed the range of vendors impacted by the Privacy Training clause (e.g., those that might have access to PII)".

	2023 Estimate	2026 Estimate	Change in Burden
Number of respondents	49,097	4,282	-44,815

Total annual responses	295,809	25,799	-270,010
Total burden hours	147,598	12,873	-134,725
Total annual cost to public	\$6,789,497	\$643,638	-\$6,145,859

16. Publicizing Results. Results will not be tabulated or published.
17. OMB Not to Display Approval. Approval to *not* display the expiration date for OMB approval of the information collection is not sought.
18. Exceptions to "Certification for Paperwork Reduction Submissions." There is no exception to the certification statement.
19. Surveys, Censuses, and Other Collections that Employ Statistical Methods. Statistical methods are not used in this information collection. A Part B supporting statement is not needed, or required, and therefore was not completed.

<u>FY</u>	<u>SAM.gov award data</u>	
	<u>Awards</u>	<u>Unique entities</u>
2023	26706	14345
2024	26130	14265
2025	25316	14212
Average	26051	14274