

JUSTIFICATION FOR 9000-0034
EXAMINATION OF RECORDS BY COMPTROLLER
GENERAL AND CONTRACT AUDIT

A. Justification.

1. Administrative requirements. The Audit and Records-Negotiation clause, 52.215-2; Contract Terms and Conditions Required to Implement Statutes or Executive Orders-Commercial Items clause, 52.212-5; and Audit and Records-Sealed Bidding clause, 52.214-26, implement the requirements of 10 U.S.C. 2313, 41 U.S.C. 254, and 10 U.S.C. 2306. The statutory requirements are that the Comptroller General and/or agency shall have access to, and the right to, examine certain books, documents and records of the contractor for a period of 3 years after final payment. The record retention periods required of the contractor in the clauses are for compliance with the aforementioned statutory requirements.

2. Uses of information. The information must be retained so that audits necessary for contract surveillance, verification of contract pricing, and reimbursement of contractor costs can be performed.

3. Consideration of information technology. This collection requires notification "in writing" and the FAR definition "in writing" does not preclude electronic transmission. This collection is GPEA compliant.

4. Efforts to identify duplication. This requirement was issued under the Federal Acquisition Regulation (FAR) which has been developed to standardize Federal procurement practices and eliminate unnecessary duplication.

5. If the collection of information impacts small businesses or other entities, describe methods used to minimize burden. The burden applied to small businesses is the minimum consistent with applicable laws, Executive orders, regulations, and prudent business practices.

6. Describe consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently. Similar information is not already available to the contracting officer or buyer.

7. Special circumstances for collection. Collection of information on a basis other than solicitation-by-solicitation is not practical. Collection is consistent with guidelines in 5 CFR 1320.6.

8. Efforts to consult with persons outside the agency. Under the procedures established for development of the FAR, agency and public comments were solicited and each comment addressed before finalization of the text. A notice published in the *Federal Register* at 75 FR 10268, on March 5, 2010. No comments were received.

9. Explanation of any decision to provide any payment or gift to respondents, other than reenumeration of contractors or guarantees. Not applicable.

10. Describe assurance of confidentiality provided to respondents. This information is disclosed only to the extent consistent with prudent business practices and current regulations.

11. Additional justification for questions of a sensitive nature. No sensitive questions are involved.

12 & 13. Estimated total annual public hour and cost burden. Time required to read and prepare information is estimated at 10 minutes per contract.

Estimated respondents/yr.....	19,142
Responses annually.....	x 20
Total annual responses.....	382,840
Estimated hrs/response.....	0.167
Estimated total burden/hrs.....	63,934
Estimated cost to public (\$24 + 75% OH).....	\$2,685,228

14. Estimated cost to the Government. Time required for Governmentwide review is based on numbers of man years reported for performance of audits authorized by the clauses.

Annual Reporting Burden and Cost

Review time/yr.....	2,600,000
Average wages/hr. with benefits & overhead	x \$50
Total Government cost/yr.....	\$130,000,000

15. Explain reasons for program changes or adjustments reported in Item 13 or 14. This submission requests an extension of OMB approval of an information collection requirement in the FAR. The information collection requirement in the FAR remains unchanged. However, the estimates have increased because of the salary changes made to reflect increases/inflation.

16. Outline plans for published results of information collections. Results will not be tabulated or published.

17. Approval not display expiration date. Not applicable.

18. Explanation of exception to certification statement.
Not applicable.

B. Collection of Information Employing Statistical Methods.

Statistical methods are not used in this information collection.