

2700- 0089: Acquisition Process Reports Required for Contracts with a Value of more than \$500,000

A. Justification.

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

This information, in the form of reports for contracts with a value more than \$500,000, is required to monitor contract compliance in support of NASA's mission and in response to contractual requirements. The requirements for this information is set forth in the Federal Acquisition Regulation (FAR), the NASA FAR Supplement, and approved mission requirements.

2. Indicate how, by whom, how frequently, and for what purpose the information will be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

Contractors must furnish information under their contracts that support authorized programs and projects within NASA. The greater the dollar value and complexity of the procurement, the greater the number and frequency of the reports required; hence, more time is required to produce them. Also, cost-type contract have more reporting requirements than fixed-price contracts. Although there may be some similiarity between contracts, each contract is unique and has its own reporting requirements.

The technical program and contract management personnel use this information to effectively manage and administer contracts; measure the contractor's performance; evaluate contractor management systems; ensure compliance with mandatory public policy provision; evaluate and control costs charged against contracts; detect and minimize conditions conducive to fraud, waste and abuse; and to form a database for general overview reports to the Congressional and Executive Branches. Without this information, NASA would not be able to gain the insight into contractor activity required to effectively manage and meet its Agency mission requirements.

3. Describe whether, and to what extent the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology. Also describe any consideration of using information technology to reduce burden.

NASA encourages the use of computer technology and is participating in Federal efforts to extend the use of information technology to more processes via the Internet. Currently, property reporting is accomplished electronically and the NASA Acquisition Internet Service (NAIS) has

developed a system for subcontract reporting which will ultimately tie into a Federal-wide system. Similarly, NASA's past performance database provides for electronic tracking of contractor performance. Contractors are encouraged to submit reports required under contracts in electronic form whenever available. This include cost reports, progress reports, new technology and patent reports, and final reports. The NAIS hosts a Library of procurement regulations, procedures, policies, and forms. Having this available to the public on-line at all times helps reduce effort, time, and expense on industry's part in tracking down a clause, regulation, or public law.

4. Describe efforts to identify duplication.

NASA procurement procedures are continually reviewed to determine duplication of effort and other inefficiencies. Each procurement is a stand-alone action which is based upon unique project requirements and cannot be used to collect information for other requirements . There is no other known report in existence that collects this information.

5. If the collection of information impacts small businesses or other small entities (Item five of form OMB 83-I, the Paperwork Reduction Act Submission form), describe any methods used to minimize burden.

The number of small businesses and other small entities impacted is not significant. Burden is the minimum necessary consistent with prudent business practices.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently.

If any restrictions were placed on the collection of information, NASA would not be able to meet its mission requirements.

7. Explain any special circumstances that would cause an information collection to be conducted in certain manners (as listed).

Not applicable.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR § 1320.8 (d), soliciting comments on the information collection before submission to OMB.

See attached Federal Register notices. No comments on the collection were received.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Not applicable.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The confidentiality of information provided in response to a solicitation is governed by statutes, the Freedom of Information Act, and FAR and NFS clauses contained in the contract.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

Not applicable.

12. Provide estimates of the hour burden of the collection of information.

Number of respondents submitting reports:	1,700
Average annual reports per respondent:	<u>55</u>
Total annual responses:	93,500
Hours per report:	<u>7</u>
TOTAL ANNUAL HOURS:	<u>654,500</u>

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

The estimated annual contractor cost is calculated by multiplying the estimated number of hours in submitting reports (654,500) by an estimated cost rate of \$40 per hour, totaling \$26,180,000. It should be noted that contractors are reimbursed by the Government for the preparation of reports produced under cost-type contracts and that the contractor has included the cost of reports required under fixed-price contracts in the total price of the contract.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses, and any other expense that would not have been incurred without this collection of information.

The estimated annual cost to NASA for the review of reports for contracts valued at more than \$500K is \$1.8 million. This estimate is calculated by determining the average costs for the hours taken by contracting, financial, program, and data support personnel to compile and analyze the data in the required reports.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

While the number of respondents increased, increased use of performance based contracts and commercial contracts has a slight impact on the number of reports required. Additionally, use of

information technology for preparation and submission of reports also results in decrease in the amount of time required to provide reports. The overall result is a decrease in the total burden.

16. For collections of information intended for publication, outline plans for tabulation and publication.

Various levels of vendor information will be available to the public via the NAIS on-line system. However, sensitive information is not intended for publication.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display may be inappropriate.

Not applicable.

18. Explain each exception to the certification statement identified in item 19, "Certification for Paperwork Reduction Act Submissions" of OMB Form 83-1.

Not applicable.

B. Collections of Information Employing Statistical Methods.

Not applicable.