

**SUPPORTING STATEMENT
2700-0054**

Modifications Related to Engineering Change Proposals, NFS 1843

A. Justification.

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

This collection is required to ensure engineering changes are made quickly and in a cost-effective manner. Proposals supporting such change orders contain detailed information which enables the Government to obtain the best goods and services for the best prices. The requirement for them is 48 CFR Part 1843.

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.*

NASA procurement and technical personnel use the information to manage the contract and to arrive a fair price for engineering changes made during contract performance. Change proposals are submitted whenever a change order results in an increase or decrease to the contractor's cost to perform the contract. Without change orders, NASA would often be unable to obtain the best goods and services at the best prices.

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 when preparing change proposals. NASA does not prescribe a format for submission, and most contractors have cost collection systems which are utilized for proposal preparation. Also, NASA participates in Federal efforts to extend the use of information technology to more Government processes via the Internet.

4. *Describe efforts to identify duplication.*

NASA procurement procedures are continually being reviewed to eliminate duplication and other inefficiencies. Each engineering change is unique and the information required in an ECP is not available elsewhere. There is no duplication of 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.

Small businesses may receive engineering changes and may be required to submit a proposal in response. The cost of preparing an ECP is included in the proposal and is reimbursable under the contract.

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

Absence of change proposals would often render NASA unable to fulfill its mission.

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

None

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.

April 18, 2008; Page 21160

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

None

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

The confidentiality of this data is governed by statutes, the Freedom of Information Act, and contract clauses. NASA's adherence to the NASA FAR Supplement ensures that right in data and proprietary information are protected.

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.

No sensitive questions are involved.

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

No. of Respondents	Annual No. of Responses	Hours per Response	TOTAL HOURS
150	1	30	4500

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

There is no cost burden to respondents or record-keepers, as costs related to the collection of this information are reimbursed by the Federal Government.

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.

150 ECPs received. Estimated hours to review each ECP is 10. Annual cost to NASA is 1,500 hrs. or \$67,500. This estimate is calculated by determining the average costs (GS-13 at \$45/hr) for hours taken by procurement and technical personnel to compile and analyze the data in the reports and proposals.

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

There were no significant changes.

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

Not applicable

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.

Approval Expiration Date may be displayed.

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

Not applicable.

B. Collections of Information Employing Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on the Form OMB 83-I is checked, "Yes," the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection methods to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

Collection Name	Start	End	Purpose	Method	Population	Est. # Respondents	Burden Hours
Modifications Related to Engineering Change Proposals	Sept FY09	Aug FY12	Ensure engineering changes are made quickly and in a cost effective manner	Free Format	NASA Contractors	150	150X30 = 4500

2. Describe the procedures for the collection of information including:

- * Statistical methodology for stratification and sample selection,***
- * Estimation procedure,***
- * Degree of accuracy needed for the purpose described in the justification,***
- * Unusual problems requiring specialized sampling procedures, and***
- * Any use of periodic (less frequent than annual) data collection cycles to reduce burden.***

Statistical methodology for stratification and sample selection:

Due to the subjective and individual nature of every engineering modification, statistical methods are not used. Instead, each engineering modification is reviewed on a case-by-case basis by procurement and technical personnel.

3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

The information collection respondents are contractors. Proposals supporting change orders contain detailed information which enables the Government to obtain the best goods and services for the best prices. The requirement for them is 48 CFR Part 1843

4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of test may be submitted for approval separately or in combination with the main collection of information.

Because of the free format for the information collecting, no tests of procedures are conducted.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

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