

SUPPORTING STATEMENT – PART A

OMB Control No. 0704-0231 – Defense Federal Acquisition Regulation Supplement (DFARS) Part 237, Service Contracting, associated DFARS Clauses at DFARS 252.237, and DD Form 2063, Record of Preparation and Disposition of Remains

A. JUSTIFICATION

1. Need for the Information Collection

This supporting statement justifies the information collection requirements for two DFARS provisions and two DFARS clauses:

- a. DFARS provision 252.237-7000, Notice of Special Standards of Responsibility, is prescribed at DFARS 237.270 for use in solicitations for the acquisition of audit services.
- b. DFARS clause 252.237-7011, Preparation History, is prescribed at 237.7003 for use in all mortuary service solicitations and contracts.
- c. DFARS provision 252.237-7024, Notice of Continuation of Essential Contractor Services, is prescribed at 237.7603(b) for use in solicitations involving the acquisition of services in support of mission essential functions and that include the clause at 252.237-7023.
- d. DFARS clause 252.237-7023, Continuation of Essential Contractor Services, is prescribed at 237.7603(a) for use in all solicitations and contracts for services in support of mission-essential functions.

2. Use of the Information

The information collected under this clearance is used as follows:

- a. DFARS 252.237-7000(c) – to verify that the offeror is properly licensed in the state or other political jurisdiction where the offeror operates its professional practice.
- b. DFARS 252.237-7011 and DD Form 2063, Record of Preparation and Disposition of Remains (Within CONUS) – to verify that the deceased’s remains have been properly cared by the mortuary contractor.
- c. DFARS 252-237-7024 – this written plan, submitted concurrently with the proposal or offer, allows the contracting officer to assess the offeror’s capability to continue providing contractually required services to support the DoD component’s mission essential functions in an emergency.
- d. DFARS 252.237-7023 – allows the contracting officer to provide approval of updates to the contractor’s plan, provided under 252.237-7024, to ensure that the contractor can continue to provide services in support of the DoD component’s required mission essential functions in an emergency.

3. Use of Information Technology

Information technology is used to the maximum extent possible. Where both the Government and the offeror or contractor is capable of electronic interchange, the information collection requirements may be submitted electronically, and the usage of information technology is 100 percent.

4. Non-duplication

As a matter of policy, DoD reviews the DFARS to eliminate unnecessary duplication. This request for information applies solely to DoD and does not duplicate any other requirement in the Federal Acquisition Regulation. Similar information is not readily available from any other source.

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

Failure to collect this information may result in the following:

- a. DFARS 252.237-7000 – the award of a contract to an offeror that is not licensed to operate by the cognizant state or other licensing authority.
- b. DFARS 252.237-7011 – the inability to verify the preparation history in a timely manner, thereby incurring unnecessary expense or the risk of improper care of the remains.
- c. DFARS 252.237-7024 and 252.237-7023 – the inability to ensure contractors have adequate continuity plans increases the risk that Government operations may be severely impaired during crisis situations.

7. Paperwork Reduction Act Guidelines

Collection of the information does not require any of the special circumstances cited at 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

a. This information collection is consistent with the guidelines in 5 CFR 1320.8(d). A notice of submission to OMB for clearance of this information collection was published in the *Federal Register* on December 22, 2016 ([81 FR 93906](#)).

b. The availability of requested information, frequency of collection, and other aspects

of the information collections addressed in this supporting statement were discussed with various subject matter experts outside OSD, including the Defense Contract Audit Agency (DCAA), the Defense Prisoner of War/Missing in Action Accounting Agency, and the Deputy Chief of Naval Operations, U.S. Navy.

c. A notice of submission to OMB for clearance of this information collection was published in the *Federal Register* on March 27, 2017 ([82 FR 15189](#)).

9. Gifts or Payment

No payment or gift will be provided to respondents, other than remuneration of contractors under their contracts.

10. Confidentiality

PII is collected as a result of this collection. The related Privacy Act Statement, SORN, and PIA have been included with the submission to OMB.

11. Sensitive Questions

SSN is collected as a result of this collection and is considered sensitive information. An SSN Justification Memo has been included with the submission to OMB.

12. Estimate of public burden

a. 252.237-7000, Notice of Special Standards of Responsibility. Review of Federal Procurement Data System (FPDS) data obtained for fiscal year (FY) 2015 reveals that approximately 26 unique vendors (respondents) received contracts for audit support services during this timeframe. Discussion with a representative from DCAA confirms that the estimated amount of time it takes to furnish the requisite documentation is .5 hours (thirty minutes). Based on this information, the estimated annual public burden associated with 252.237-7000 is estimated as follows:

Estimation of Respondent Burden Hours: 252.237-7000	
Number of respondents	26
Responses per respondent	1
Number of responses	26
Hours per response	.5
Estimated hours (number of responses multiplied hours per response)	13
Cost per hour (hourly rate)*	\$38
Annual public burden (estimated hours multiplied by cost per hour)	\$494

*The estimated cost per hour of \$38.34 is based on the 2016 GS-11/Step 5 base hourly rate of \$28.14 plus 36.25 percent burden (pursuant with OMB Memorandum M-08-13) of \$10.20 per hour; the rate is rounded to the nearest dollar or \$38.

b. 252.237-7011, Preparation History, and DD Form 2063, Record of Preparation and Disposition of Remains (Within CONUS). The clause requires the contractor to provide a written summary of the results of the embalming process on a certificate furnished by the contracting officer. According to the DoD subject matter expert consulted for this clause, DD Form 2063 is generally used for this purpose.

The contractual vehicles used by DoD for mortuary services are regionally-issued, requirements-type contracts, although under certain circumstances purchase orders may be used. When mortuary services are needed, an order (either task or purchase) for this support is issued by the contracting activity. Since the contractor is required to provide the written summary of the mortuary services rendered at the order level, this paperwork burden analysis is predicated on order level information.

The source data used to develop the estimated number of respondents and responses per respondent was obtained from FPDS. Although on previous occasions the source data was the Defense Casualty Analysis System (DCAS), the DCAS database has limited utility in this regard because it only captures conflict casualty information. In addition, the records maintained in DCAS predominantly reflect casualties that occurred outside the United States. In contrast, DFARS 252.237-7011 is used to address a broader range of situations, including deaths due to natural causes and is only applicable within the United States. For this reason, DCAS information was not used for this analysis.

Examination of FPDS data for FY 2013, 2014, and 2015 reveals that the average number of orders (both purchase and task orders) issued by DoD for mortuary services is approximately 126 orders per year to approximately 21 unique contractors. The average number of responses per respondent is approximately six (126/21). According to the subject matter expert familiar with DoD’s mortuary policies, each written summary requires approximately .5 hours (thirty minutes) to prepare. Based on this information, the following the estimated public burden hours and cost are calculated:

Estimation of Respondent Burden Hours: 252.237-7011	
Number of respondents	21
Responses per respondent	6
Number of responses	126
Hours per response	.5
Estimated hours (number of responses multiplied hours per response)	63
Cost per hour (hourly rate)*	\$32
Annual public burden (estimated hours multiplied by cost per hour)	\$2,016

*The estimated cost per hour is based on the 2016 GS-9/Step 5 base hourly rate of \$23.25 plus 36.25 percent burden (pursuant with OMB Memorandum M-08-13) of \$8.43 per hour; the rate of \$31.68 is rounded to the nearest dollar or \$32.

c. 252.237-7024, Notice of Continuation of Essential Contractor Services, and 252.237-7023, Continuation of Essential Contractor Services. 42 U.S.C. 5195, provides the statutory authority for executive agencies to have a comprehensive emergency preparedness system. Within DoD, this policy is implemented through several directives and instructions, namely DoD Directive 3020.26 and DoD Instruction 3020.42, which outline the responsibilities for carrying out mission essential functions in the event of an emergency.

(1) The provision at 252.237-7024 requires offerors to submit a written plan concurrently with its offer, describing how it will continue to perform essential contractor services in support of designated mission-essential functions.

The annual public burden estimates for this provision are based on information obtained from the Electronic Document Access (EDA) system for FY 2015, the most current, complete Government fiscal year for which this data is available. The advantage of using EDA as opposed to FPDS in this instance is that EDA can provide individualized acquisition-related information, such as the incorporation of a specific clause within a contract. Analysis of the EDA data reveals that approximately 673 contracts containing the clause at 252.237-7023 were awarded. DFARS 237.7602(b) prescribes the inclusion of the provision 252.237-7024 in all solicitations for services that include the clause at 252.237-7023.

Further examination of the EDA data reveals that 518 unique contractors received these awards. The estimated number of offerors that would have submitted a written plan, known as the Mission-Essential Contractor Services Plan, was arrived at by multiplying the number of unique contractors by four, which equates to 2,072 offerors (518 X 4). As will be explained in the burden analysis for the clause, the number of responses per respondent (the offeror) is approximately 1.3, therefore the estimated number of offers containing a Mission-Essential Contractor Services Plan (responses) is 2,694 (2,072 X 1.3). Finally, consultation with the subject matter expert familiar with the requirements of the provision reveals that the average amount of time expended by the respondent per response is two hours. Based on this information, the estimated public burden for 252.237-7024 is calculated as follows:

Estimation of Respondent Burden Hours: 252.237-7024	
Number of respondents	2,072
Responses per respondent	1.3
Number of responses	2,694
Hours per response	2
Estimated hours (number of responses multiplied hours per response)	5,388
Cost per hour (hourly rate)*	\$32
Annual public burden (estimated hours multiplied by cost per hour)	\$172,416

*The estimated cost per hour is based on the 2016 GS-9/Step 5 base hourly rate of \$23.25 plus 36.25 percent burden (pursuant with OMB Memorandum M-08-13) of \$8.43 per hour; the rate of \$31.68 is rounded to the nearest dollar or \$32.

(2) 252.237-7023, Continuation of Essential Contractor Services. Contractors awarded a contract that involves the performance of an essential contractor service must

maintain and update its Mission-Essential Contractor Services Plan as needed.

The analysis of the public burden associated with this clause also relied on FY 2015 EDA information. As previously mentioned, a total of 673 contracts were awarded that contained the clause and the number of unique contractors (respondents) that received these contracts is 518. The number of responses per respondent is 1.3 (673/518). Compliance with the clause entails the maintenance and updating of an existing plan. The subject matter expert familiar with the requirements of the clause estimates that the amount of time needed to maintain and update a plan averages .5 hours (thirty minutes). Based on this information, the calculation for the estimated public burden associated with this requirement is as follows:

Estimation of Respondent Burden Hours: 252.237-7023	
Number of respondents	518
Responses per respondent	1.3
Number of responses	673
Hours per response	.5
Estimated hours (number of responses multiplied hours per response)	337
Cost per hour (hourly rate)*	\$32
Annual public burden (estimated hours multiplied by cost per hour)	\$10,784

*The estimated cost per hour is based on the 2016 GS-9/Step 5 base hourly rate of \$23.25 plus 36.25 percent burden (pursuant with OMB Memorandum M-08-13) of \$8.43 per hour; the rate of \$31.68 is rounded to the nearest dollar or \$32.

d. Total Public Burden (252.237-7000, 252.237-7011, 252.237-7024, and 252.237-7023):

Estimated Total Respondent Burden Hours:	
Number of respondents	2,637
Responses per respondent, approximately	1.33
Number of responses	3,519
Hours per response, approximately	1.6
Estimated hours (number of responses multiplied hours per response)	5,801
Cost per hour (hourly rate)	\$32
Annual public burden (estimated hours multiplied by cost per hour)	\$185,710

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents, other than the burden costs addressed in Item 12.

14. Estimated Cost To Government

a. 252.237-7000, Notice of Special Standards of Responsibility. The estimated number of respondents, responses per respondent, cost per hour, and the methodology used to derive these estimates is provided in 12(a). The DCAA subject matter expert estimates that the estimated amount of time it takes the Government to review each response is .25 hours (fifteen minutes). Based on this information, the following calculation of the Government burden associated with this provision is as follows:

Estimation of Government Burden Hours: 252.237-7000	
Number of respondents	26
Responses per respondent	1
Number of responses	26
Hours per response	.25
Estimated hours (number of responses multiplied hours per response)	7
Cost per hour (hourly rate)	\$38
Annual public burden (estimated hours multiplied by cost per hour)	\$247

b. 252.237-7011, Preparation History, and DD Form 2063, Record of Preparation and Disposition of Remains (Within CONUS). The estimated number of respondents, responses per respondent, cost per hour, and the methodology used to derive these estimates is provided in 12(b). The subject matter expert for mortuary support services states that the Government requires approximately .25 hours (fifteen minutes) to review the contractor's written summary. Based on this information, the following calculation of the Government burden associated with this clause is as follows:

Estimation of Government Burden Hours: 252.237-7011	
Number of respondents	21
Responses per respondent	6
Number of responses	126
Hours per response	.25
Estimated hours (number of responses multiplied hours per response)	32
Cost per hour (hourly rate)	\$32
Annual public burden (estimated hours multiplied by cost per hour)	\$1,024

c. 252.237-7024, Notice of Continuation of Essential Contractor Services and 252.237-7023, Continuation of Essential Contractor Services. The estimated number of respondents, responses per respondent, cost per hour, and the methodology used to derive these estimates is provided in 12(c)(1) and 12(c)(2). The subject matter expert familiar with the requirements associated with both the provision and the clause estimates that the amount of time needed to (1) review an offeror's Mission-Essential Contractor Services Plan; and (2) review any required updates to the contractor's plan is .5 hours (thirty minutes). The following calculation of the estimated Government burden is provided:

Estimation of Government Burden Hours: 252.237-7024	
Number of respondents	2,072
Responses per respondent	1.3
Number of responses	2,694
Hours per response	.5
Estimated hours (number of responses multiplied hours per response)	1,347
Cost per hour (hourly rate)	\$32
Annual public burden (estimated hours multiplied by cost per hour)	\$43,104

Estimation of Government Burden Hours: 252.237-7023	
Number of respondents	518
Responses per respondent	1.3
Number of responses	673
Hours per response	.5
Estimated hours (number of responses multiplied hours per response)	337
Cost per hour (hourly rate)	\$32
Annual public burden (estimated hours multiplied by cost per hour)	\$10,784

d. Total Government Burden (252.237-7000, 252.237-7011, 252.237-7024, and 252.237-7023:

Estimation of Total Government Burden Hours:	
Number of respondents	2,636
Responses per respondent	10
Number of responses	3,519
Hours per response	.5
Estimated hours (number of responses multiplied hours per response)	1,760
Cost per hour (hourly rate)	\$32
Annual public burden (estimated hours multiplied by cost per hour)	\$56,320

15. Reasons for Change in Burden

There is no program change; however the following adjustments have been made:

Provision or Clause	2013 Burden Hours	2017 Burden Hours	Diff. Hours	2013 Cost	2017 Cost	Diff. Cost
252.237-7000	5	13	8	\$186	\$494	\$308
252.237-7011	400	63	-337	\$12,300	\$2,016	-\$10,284
252,237-7024						
252.237-7023	17,500	5,725	-11,775	\$538,125	\$183,200	-\$354,925
TOTALS	17,905	5,801	-12,104	\$550,611	\$185,710	-\$364,901

- 252.237-7000 - The increase of burden hours and cost is due the use of FY 2015 FPDS

- data and the 2016 GS hourly rates.
- 252.237-7011 – The decrease of burden hours and cost is due to the use of the FY 2015 FPDS data instead of the DCAS database and the 2016 GS hourly rates.
 - 252.237-7024/252.237-7023 – The decrease of burden hours and cost is due to the use of FY 2015 EDA information rather than FPDS, and the 2016 GS hourly rates.

16. Publication of Results

Results of this collection will not be published.

17. Non-Display of OMB Expiration Date

We do not seek approval to not display the expiration dates 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.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods will not be employed.