

**Supporting Statement for Paperwork Reduction Act Submission
GSAR 516-506, Solicitation Provisions and Contract Clauses; 552.216-72, Placement
of Orders; and 552.216-73, Ordering Information
(OMB Control No. 3090-0248)**

A. Justification

1. Explain the circumstances that make the collection of information necessary.

For many years, the General Services Administration (GSA), Federal Acquisition Service (FAS) has had the capability to place orders under contracts electronically via Electronic Data Interchange (EDI). The General Services Administration Acquisition Regulation (GSAR) has prescribed in GSAR 516.506 the use of GSAR clauses 552.216-72, Placement of Orders, and 552.216-73, Ordering Information in solicitations and contracts for Federal Supply Schedule (FSS) contracts to provide requirements for Offerors to receive electronic orders through computer-to-computer EDI.

To accomplish EDI, a company enters into a Trading Partner Agreement (TPA) with FAS. The use of EDI furthers congressional and executive branch policies that Federal agencies provide leadership in advancing environmental objectives through technology and the expanded use of electronic commerce.

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

Establishing TPAs with contractors ensures compatibility of Government and contractor equipment and that each party understands the responsibility associated with placing orders using the EDI method.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques.

FAS uses EDI to the maximum extent practicable. This electronic method of placing delivery orders facilitates and advances the use of information technology under the FSS program.

Collection methods and procedures are periodically reviewed to determine if the information collection is still needed and if improved technology is available. In connection with Governmentwide e-initiatives and statutory requirements, FAS is exploring receiving responses to solicitations and contract data collection electronically.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

FAS did not identify any duplication of information collected. Our review did not identify any similar data request. The information is required for each solicitation to ensure it reflects the offeror's current business practices.

**Supporting Statement for Paperwork Reduction Act Submission
GSAR 516-506, Solicitation Provisions and Contract Clauses; 552.216-72, Placement
of Orders; and 552.216-73, Ordering Information
(OMB Control No. 3090-0248)**

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

The burden applies equally to small businesses that opt to do business with GSA. The information collected is necessary to meet the specific objectives of the solicitation or contract.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Unless a contractor establishes a TPA with FAS to use the EDI procedures, it will not receive delivery orders through this manner. Otherwise, orders will be mailed to the contractor.

7. Explain any special circumstances.

Collection is consistent with guidelines in the 5 CFR 1320.6.

8. Describe efforts to consult with persons outside the agency.

A 60-day notice was published in the *Federal Register* at 83 FR 24310, on May 25, 2018. No comments were received. A 30-day notice was published in the *Federal Register* at 83 FR 42500 on August 22, 2018. No comments were received.

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

N/A.

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

Information in an offeror's proposal is considered classified information and is only made available to those privy to that proposal. This information is disclosed only to the extent consistent with agency regulations and applicable statutes.

11. Provide additional justification for any questions of a sensitive nature.

No sensitive questions are involved.

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

GSA based the estimated burden of the collection of information on information obtained from subject matter experts familiar with the approximate number of vendors electing to receive orders via computer to computer Electronic Data Interchange or other electronic means, and the range of processing times, depending on the complexity of the contract.

**Supporting Statement for Paperwork Reduction Act Submission
 GSAR 516-506, Solicitation Provisions and Contract Clauses; 552.216-72, Placement
 of Orders; and 552.216-73, Ordering Information
 (OMB Control No. 3090-0248)**

The burden addressed in this information collection requirement is the burden of submitting the required information.

Number of respondents:	18,590
Responses per respondent:	<u>x 1</u>
Number of responses:	18,590
Avg. hours per response:	<u>x .25</u>
Estimated hours:	4,678

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

The estimated annualized cost to the public is \$128,645. (18,590 annual responses * .25 hours per response = 4,678 * \$27.50 (\$20.81+36.25% overhead)).

Respondents:	18,590
<u>Responses per respondent:</u>	<u>x 1</u>
Total annual responses:	18,590
<u>Preparation hours per response:</u>	<u>x .25</u>
Total burden hours:	4,678
<u>Average hourly wages(\$20.18+36.25% overhead):</u>	<u>x \$27.50</u>
Total annual recordkeeping cost:	\$128,645

The cost of \$27.50 per hour is based on the national mean hourly wage for a procurement clerk. (Occupational Employment and Wage, May 2016, U.S. Bureau of Labor Statistics, Effective May 2016), with fringe of 36.25% (OMB Memo M-08-13). The estimated cost per response is \$6.92.

14. Provide estimates of annualized costs to the Federal Government.

The estimated cost to the Federal Government is \$105,442. (4,678 estimated burden hours *\$22.54).

Number of responses	18,590
Avg. hours per response	<u>x .25</u>
Estimated Hours	4,678
Cost per hour	<u>x \$22.54</u>
Total annual Government cost	\$105,442

The cost of \$22.54 per hour is based on the GS-7, step 5 salary. (Base Pay and Rest of US Locality Pay) (Salary Table 2018-GS, Effective January 2018), with fringe of 36.25% (OMB Memo M-08-13).

15. Explain the reasons for any program changes or adjustments reported.

The number of responses has decreased from 26,756 to 18590. This decrease is attributed to a decrease in orders submitted through facsimile and additional orders that

**Supporting Statement for Paperwork Reduction Act Submission
GSAR 516-506, Solicitation Provisions and Contract Clauses; 552.216-72, Placement
of Orders; and 552.216-73, Ordering Information
(OMB Control No. 3090-0248)**

were not captured in the previous information collection. It does not involve any program changes.

16. For collections of information whose results will be published, outline plans for tabulation and publication.

Results will not be tabulated or published. Data collected will be used for internal administration of contracts.

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

N/A.

18. Explain each exception to the certification statement identified in the “Certification for Paperwork Reduction Act Submissions”.

N/A.

B. Collections of Information Employing Statistical Methods.

Statistical methods are not used in this information collection.