

**Supporting Statement for Information Collection:  
Construction-Manager-as-Constructor Contracting  
(OMB Control No. 3090-0308)**

**A. Justification.**

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

The General Services Administration (GSA) is proposing to amend the General Services Administration Acquisition Regulation (GSAR) coverage on construction contracts, including provisions and clauses for solicitations and resultant contracts, to clarify, update, and incorporate existing construction contract administration procedures.

**2. Indicate how, by whom, and for what purpose the information is to be used.**

The information is used by contracting officers to review required submittals and evaluate a contractor's progress during contract administration.

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

GSA uses improved information technology to the maximum extent practicable. Where both GSA and contractors are capable of electronic interchange, contractors may submit information requirements 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.**

There is no similar data and no duplication exists.

**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. This information collected is necessary to meet the specific objectives of the 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.**

Not collecting this information or collecting this information less frequently would impede contracting officers from performing their administrative functions in an efficient and effective manner.

**7. Explain any special circumstances.**

No special circumstances exist. Collection is consistent with the guidelines in 5 CFR 1320.6.

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

A notice was published in the *Federal Register* at 81 FR 62434, on September 9, 2016, as part of a proposed rule under GSAR Case 2015-G503. No comments were received on the information collection. A 30-day notice was published in the *Federal Register* at 83 FR 66264 on December 26, 2018. No comments 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 assurance in statute, regulation, or agency policy.**

Information collected is disclosed only to the extent consistent with prudent business practices, agency regulations, and applicable statutes.

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

No sensitive questions are involved.

**12 & 13. Provide estimates of the hour burden of the collection of information.**

Total public reporting burden estimated for this information collection includes the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

The new clause at GSAR 552.236-72, Submittals provides guidance to contractors regarding preparation, submission and resubmission of required contract submittal documents. Given the types of submittal documents associated with a typical construction project, an estimate of 8 hours per contract was assumed for the response burden. The clause was previously GSAR 552.236-78, Shop Drawings, Coordination Drawings, and Schedules. The clause is simplified, including removing the requirement for a specific number of prints and copies of various submittals such as shop drawings, coordination drawings, and schedules. This simplification will ease the compliance burden for the contractor during contract administration. However, an information collection was never previously filed for this clause.

Based on Fiscal Year 2015 Federal Procurement Data System data for GSA construction contracts, the estimated burden to the public is as follows:

Estimated respondents per year	3,758
Estimated responses per respondent	<u>x 1</u>
Total annual responses	3,758
Estimated hours per response	<u>x 8</u>

Total Response Burden Hours	30,064
Cost per hour*	<u>x \$54.30</u>
Estimated Cost Burden to the Public	\$1,632,475.20

\*The estimated cost of \$54.30 per hour is based on the task being accomplished by mid-level contractor personnel equivalent to a GS-12, 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). The cost per response is \$434.40.

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

Government hours per response are based on the time required to review the submittal documents.

Estimated annual responses	3,758
Estimated review time per response	<u>x 2</u>
Total Review Time	7,516
Cost per hour*	<u>x \$54.30</u>
Total Annual Government Cost	\$408,118.80

\*The estimated cost of \$54.30 per hour is based on the task being accomplished by mid-level government personnel equivalent to a GS-12, 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.**

GSA is proposing to amend the GSAR to update the text addressing GSAR Part 536, Construction and Architect-Engineer Contracts and clauses in GSAR Part 552, Solicitation Provisions and Contract Clauses.

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

Results of this collection will not be tabulated or published. Information 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.**

Not applicable.

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

Not applicable.

**B. Collections of Information Employing Statistical Methods.**

Statistical methods are not used in this information collection.