

Supporting Statement for
OMB Control No. 9000-0129
Cost Accounting Standards Administration

FAR Section Affected: 52.230-6

A. Justification.

1. Administrative requirements. This justification supports revision and extension of the expiration date of OMB Control No. 9000-0129. This clearance covers the information that contractors must submit to comply with the following Federal Acquisition Regulation (FAR) requirements:

a. 52.230-6, Administration of Cost Accounting Standards. This clause requires contractors performing Cost Accounting Standards (CAS) covered contracts to submit notifications and descriptions of certain cost accounting practice changes, including revisions to their Disclosure Statements, if applicable. Often these descriptions are quite complex.

2. Uses of information. The information is used by contracting officers for ascertaining compliance with CAS.

3. Consideration of information technology. We use improved information technology to the maximum extent practicable. Where both the Government agency and contractors are capable of electronic interchange, the contractors may submit this information collection requirement electronically.

4. Efforts to identify duplication. These requirements are issued under the FAR which has been developed to standardize Federal procurement practices and eliminate unnecessary duplication.

5. If the collection of information impacts small businesses or other entities, describe methods used to minimize burden. There is no burden applied to small businesses, as small businesses are exempt from CAS coverage (CFR 9903.201-1(b)(3)).

6. Describe consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently. Collection of information on a basis other than contract-by-contract is not practical.

7. Special circumstances for collection. Collection is consistent with guidelines in 5 CFR 1320.6.

8. Efforts to consult with persons outside the agency.

a. A 60-day notice was published in the *Federal Register* at 84 FR 37875, on August 2, 2019. No comments were received.

b. A 30-day notice was published in the *Federal Register* at 84 FR 53727, on October 8, 2019.

9. Explanation of any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees. Not applicable.

10. Describe assurance of confidentiality provided to respondents. This information is disclosed only to the extent consistent with prudent business practices, current regulations, and statutory requirements.

11. Additional justification for questions of a sensitive nature. No sensitive questions are involved.

12 & 13. Estimated total annual public hour and cost burden.

The data was obtained from the Federal Procurement Data System (FPDS) for Fiscal year 2016 through 2018. It accounts for definitive awards that included the CAS clause and excluded small business concerns.

The following is a summary of the FY 2016-2018 data using the increased threshold for requesting certified cost or pricing data of \$2 million as proposed by FAR Case 2018-005, Modifications to Cost or Pricing Data Reporting Requirements (84 FR 52428), per section 811 of the National Defense Authorization Act for Fiscal Year 2018. The threshold for CAS applicability is required by 41 U.S.C. 1502(b)(1)(B) to be the same as the

threshold for requesting certified cost or pricing data at FAR 15.403-4(a)(1).

Estimated respondents/yr.....	599
Responses per respondent/year	x 3
Total responses/year.....	1,797
Estimated hrs/response.....	x 175
Estimated total burden hrs.....	314,475
Hourly rate*	x \$55
Estimated cost to public	\$17,296,125

*The skill set required is comparable to a journeyman GS 12 step 5 equivalent. The hourly wage rate is based on OMB Circular A-76 guidance for quantifying the cost of efforts, includes: (1) the complexity level; and (2) a 36.25% fringe and overhead burden rate mandated by OMB memorandum M-08-13 for use in public-private competition. Reference Office of Personnel Management (OPM) Salary Table 2019-RUS, Effective January 2019, found at www.opm.gov for the Rest of the United States. Application of a fringe rate of .3625 to the base rate of \$40.51 rounded to the nearest dollar results in a burden rate of \$55 an hour.

Recordkeeping burden is estimated at zero hours per respondent. The records maintained to provide this information are no more than required by normal business practice.

14. Estimated cost to the Government.

Estimated responses/yr.....	1,797
Reviewing time (hr)/response	x 120
Review time/yr.....	215,640
Hourly rate*	x \$55
Estimated cost to the Government.....	\$11,860,200

15. Explain reasons for program changes or adjustments reported in Item 13 or 14.

	CAS threshold/Threshold for requesting certified cost or pricing data		Decrease in burden
	\$750K	\$2M	
Respondents	903	599	304
Responses	2,709	1,797	912
Total Hours	474,075	314,475	159,600
Estimated cost to public			\$8,778,000

The decrease of responses from 2,709 to 1,797 and the associated decrease in estimated burden hours from 474,075 to 314,475 is an adjustment due to an increase in the threshold for submitting certified cost or pricing data from \$750,000 to \$2 million resulting from the statutory changes to the Truth in Negotiations Act, 10 U.S.C. 2306a and 41 U.S.C. 3502. Raising this threshold results in fewer companies performing CAS-covered contracts.

16. Outline plans for published results of information collections. Results will not be tabulated or published.

17. Approval not to display expiration date. Not applicable.

18. Explanation of exception to certification statement. Not applicable.

B. Collection of Information Employing Statistical Methods. Statistical methods are not used in this information collection.