

**Supporting Statement for Information Collection:
Proposal to Lease Space, GSA Form 1364 and
Lessor's Annual Cost Statement, GSA Form 1217
(OMB Control No. 3090-0086)**

A. Justification.

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

In accordance with GSAR 570.802 (c), GSA Form 1364 *Proposal to Lease Space* is used to obtain information about property being offered for lease to house Federal agencies.

In accordance with GSAR 570.802(d), GSA Form 1217 *Lessor's Annual Cost Statement* is used to obtain pricing information regarding offered services and lease commissions.

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.

The information is used by leasing contracting officers to evaluate lease proposals and negotiate lease contract terms and conditions in either a competitive or non-competitive environment.

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.

Currently, except for offers submitted under GSA's Lease Offer Platform/Automated Advanced Acquisition Program (LOP/AAAP), proposals are manually completed and submitted by offerors. For non-AAAP-projects, the forms are electronically available and can be posted electronically for solicitation purposes. AAAP is a multiple award lease procurement tool that allows the market to compete for multiple federal leases by submitting a single offer through a simple online portal. GSA is expanding LOP to include the Requirement Specific Acquisition Program (RSAP). RSAP will be a single award lease procurement tool that migrates GSA's traditional lease procurement method to an e-commerce procurement and transaction tool, collecting online offers for a specific space requirement.

4. Describe efforts to identify duplication.

GSA conducted a Lease Reform Initiative to improve the lease acquisition process for GSA, client agencies, and the private sector, and, as a result, developed six separate lease contract models that were targeted to meet the needs of the national leased portfolio. Subsequent to lease reform, several models were consolidated into one model and additional models were added, for a current total of seven lease models in use. Three of the lease models require offerors to complete a GSA Form 1364 and two require completion of GSA Form 1217.

The GSA Form 1364 versions (1364, 1364A, 1364A-1, and 1364WH) require the submission of information specifically aligned with certain leasing models and avoid mandating submission of information that is not required for use in evaluation and award under each model.

The GSA Form 1217 requires the submission of information specific to the services and utilities of a building in support of the pricing detailed under GSA Forms 1364 and 1364A.

The forms relate to individual lease procurements 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 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.

GSA would be unable to readily and equitably evaluate offers fairly and competitively.

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 60-day notice was published in the *Federal Register* at 84 FR 44306 on August 23, 2019. No comments were received. A 30-day notice published in the *Federal Register* at 84 FR 61617 on November 13, 2019.

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 provided through the GSA Forms 1364 and GSA Form 1217 is confidential. Information collected is disclosed only to the extent consistent with agency regulations and applicable statutes.

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.

GSA estimated the burden of the information collection from data obtained from subject matter experts in GSA’s Office of Leasing. The estimated cost of \$72.45 per hour is based on the 2018 National Association of Realtors (NAR) Commercial Member Profile, which surveys commercial real estate brokers. The 2018 report shows an average annual income of \$150,700 for 2017. When divided by 2080 hours per year, that equals \$72.45 per hour. The NAR survey results were published at www.nar.realtor.

Data	Lease Models				Total
	Global - Competitive	Global – Succeeding/ Superseding	Simplified	Warehouse	
Total Projects	255	95	56	20	426
Number of Responses Per Project	4.1	1.0	3.7	4.1	
Annual Responses	1,045.5	85	207.2	82	1,430
Estimated Hours Per Response	4.3	3.2	3.5	4.3	
Estimated Total Burden Hours	4,496	304	725	353	5,877
Average Cost Per Hour	\$72.45	72.45	72.45	72.45	
Total Cost to Public	\$325,709.84	\$22,024.80	\$52,540.74	\$25,545.87	\$425,821.25

Estimated respondents per year	426
Estimated responses per respondent (weighted average)	3.36
Estimated total responses	1,430
Estimated hours per response (weighted average)	4.11
Estimated total burden hours	5,877
Cost per hour	\$72.45
Estimated Burden to the Public	\$425,821.25

The estimated cost per response is \$298.

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

Not applicable. See response to Item 12, above.

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

GSA estimated the annual cost to the Federal Government of the information collection from data obtained from subject matter experts in GSA’s Office of Leasing. Government hours per response are based on the time required to review and evaluate the lease forms.

The estimated cost per hour is based on the task being accomplished by a journeyman equivalent to a GS-12, Step 5 rate of \$40.51 (Base Pay and Rest of US Locality Pay) (Salary Table 2019-GS, Effective January 2019), with fringe of 36.25% (\$14.68) (OMB Memo M-08-13) for a total cost per hour of \$55.19.

Data	Lease Models				Total
	Global - Competitive	Global – Succeeding/Su perseding	Simplified	Warehouse	
Total Projects	255	95	56	20	426
Number of Responses Per Project	4.1	1.0	3.7	4.1	
Annual Responses	1,045.5	85	207.2	82	1,430
Estimated Hours Per Response	3.3	2.9	3.3	3.3	
Estimated Total Burden Hours	3,450	276	684	271	4,680
Average Cost Per Hour	\$55.19	55.19	55.19	55.19	
Total Cost to Government	\$190,414	\$15,205	\$37,737	\$14,934	\$258,289.75

Estimated respondents per year	426
Estimated responses per respondent (weighted average)	3.36
Estimated total responses	1,430
Review time per response (weighted average)	3.27
Total review time	4,680
Cost per hour	\$55.19
Total Annual Government Cost	\$258,289.75

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

The estimated burden to the public and the estimated cost to the Government have changed. The lease models and associated number of projects has changed since the last information collection renewal. In addition, the costs per hour used for the calculations were increased to reflect current wage rates.

The burden hours are based on the number of preparation hours estimated per offer to complete the forms associated with the different lease models as of 2018. The burden hours estimated includes the time for reviewing instructions, search existing data sources, gathering and maintaining the data needed, and completing and reviewing various responses.

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.

GSA regional leasing services officers estimated the average number of responses and hours required by the public and the government to complete, review, and evaluate the information submitted on each form. Forecasting is based on empirical data for number of actions and salaries.