

## SUPPORTING STATEMENT – PART A

### OMB Control Number 0704-0398 – Defense Federal Acquisition Regulation Supplement (DFARS) Part 211, Describing Agency Needs, and Related Clause at DFARS 252.211

#### A. JUSTIFICATION

##### 1. Need for the Information Collection

This justification supports OMB Control Number 0704-0398. This information collection concerns DFARS part 211, Describing Agency Needs,<sup>1</sup> prescribes the use of DFARS clause 252.211-7007, Reporting of Government-Furnished Property, which requires contractors to report data to the DoD Item Unique Identification (IUID) Registry on all serially-managed Government-furnished property (GFP), as well as contractor receipt of non-serially managed items. “Serially managed item” means an item designated by DoD to be uniquely tracked, controlled, or managed in maintenance, repair, and/or supply systems by means of its serial number. The clause provides a list of specific data elements contractors are to report to the IUID registry, as well as procedures for updating the registry.

##### 2. Use of the Information

DFARS clause 252.211-7007 strengthens the accountability and end-to-end traceability of GFP within DoD. Through electronic notification of physical receipt, the contracting officer and requirements officials are made aware that GFP has arrived at the contractor’s facility. The DoD logistics community uses the information as a data source of available DoD equipment. In addition, the DoD organization responsible for contract administration uses the data to test the adequacy of the contractor’s property management system.

##### 3. Use of Information Technology

Information technology is used to collect the covered information to the maximum extent (100%) practicable. As required by DFARS 252.211-7007, contractors report GFP data electronically to the DoD IUID Registry, which is the DoD data repository that receives input from both industry and Government sources and provides storage of, and access to, data that identifies and describes tangible Government personal property.

##### 4. Non-duplication.

As a matter of policy, DoD reviews the DFARS to determine whether adequate language already exists. This information collection does not duplicate any other requirement.

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<sup>1</sup> The information collection associated with the clause at DFARS 252.211-7006, Passive Radio Frequency Identification, which is also prescribed in DFARS part 11, is covered under OMB Control Number 0704-0434.

## 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. The burden associated with DFARS 252.211-7007 imposed on small business is necessary to achieve the necessary policy objective of strengthening DoD accountability and end-to-end traceability of GFP.

## 6. Less Frequent Collection

If the information required by DFARS 252.211-7007 is not collected, then effective accountability and management of GFP will be compromised.

## 7. Paperwork Reduction Act Guidelines

There are no special circumstances for collection. Collection of this information is consistent with the guidelines at 5 CFR 1320.5(d)(2).

## 8. Consolidation and Public Comments

i. This information collection is consistent with the guidelines in 5 CFR 1320.6. Public comments were solicited in the *Federal Register* on February 27, 2020 ([85 FR 11351](#)). One comment was received in response to this notice, which was not pertinent to subject matter of the rule.

ii. DoD subject matter experts associated with GFP policy were consulted regarding this information collection.

iii. A notice of submission to OMB for clearance of this information collection was published in the *Federal Register* on May 28, 2020 ([85 FR 32019](#)).

## 9. Gifts or Payment

DoD will not provide a payment or gift to respondents under this information collection requirement.

## 10. Confidentiality

This information is disclosed only to the extent consistent with statutory requirements, current regulations, and prudent business practices. The collection of information does not include and personally identifiable information; therefore, no Privacy Impact Assessment or Privacy Act System of Records Notice is required.

## 11. Sensitive Questions

No sensitive questions are involved.

## 12. Respondent Burden and its Labor Costs

Estimated respondent burden and labor costs are based on input and analysis from DoD subject matter experts, using fiscal year 2017 transactional data from the Invoicing, Receipt, Acceptance, and Property Transfer system (iRAPT) and a survey of the DoD GFP landscape over the last three years. In 2018, property transfer shipment and receipt reporting capability was migrated from iRAPT, as part of the Wide Area Work Flow system, to the GFP Module in the Procurement Integrated Enterprise Environment (PIEE). Data available in the GFP Module is limited due to its recent implementation; therefore, DoD subject matter experts utilized data available from iRAPT to provide the following estimates:

i. *Number of Respondents*: DoD estimates that 256 respondents (the average number of contractors that were registered in iRAPT annually) are responsible for adhering to reporting requirements under DFARS 252.211-7007 on an annual basis.

ii. *Number of Responses*. DoD estimates that 65,000 responses (as the average total number of property transfer transactions initiated by DoD each year) are entered into the GFP Module by contractors on an annual basis.

iii. *Hours per Response*: According to DoD subject matter experts experienced in managing iRAPT and the GFP Module, it takes a respondent an average of 15 minutes to acknowledge receipt of Government property in a GFP tracking system.

Estimation of Respondent Burden: 252.211-7007	
Number of respondents	256
Responses per respondent ( <i>Note 1</i> )	254
Number of responses	65,000
Hours per response	0.25
Estimated hours (number of responses multiplied hours per response)	16,250
Cost per hour (hourly wage) ( <i>Note 2</i> )	\$41
Annual public burden (estimated hours multiplied by cost per hour)	\$666,250

*Note 1: The responses per respondent is based on the number of responses (65,000) divided by the number of respondents (256); rounded to the nearest whole number.*

*Note 2: The cost per hour is based on the Office of Personnel Management (OPM) General Schedule (GS) 11, Step 5, base hourly rate for calendar year 2020 (\$29.98) plus the 36.25% civilian personnel full fringe benefit rate from OMB Memo M-08-13 (\$10.87), rounded to the nearest dollar.*

## 13. Respondent Costs Other than Burden Hour Costs

DoD does not estimate any annual cost burden apart from the hourly burden in Item 12

above.

14. Cost to the Government

The estimated annual cost to the Government to review and analyze responses from offerors under these clauses is shown in the following table. It is estimated that a GS-12, step 5, employee will take two hours to review and analyze a response.

Estimation of Cost to the Government: 252.211-7007	
Number of responses	65,000
Hours per response	2
Estimated hours	130,000
Cost per hour (hourly wage) (Note)	\$49
Cost to Government	\$6,370,000

Note: The cost per hour is based on the OPM GS 12, Step 5, base hourly rate for calendar year 2020 (\$35.93) plus the 36.25% civilian personnel full fringe benefit rate from OMB Memo M-08-13 (\$13.02), rounded to the nearest dollar.

15. Reasons for Change in Burden

Changes to the annual public burden estimate is summarized as follows:

- i. *Repeal of DFARS 252.211-7004 and 252.211-7005.*

The previously approved information collection under this OMB control number included the burden associated with DFARS provisions 252.211-7004, Alternate Preservation, Packaging, and Packing, and 252.211-7005, Substitutions for Military or Federal Specifications and Standards. These provisions are being removed from the DFARS under DFARS cases 2019-D022 and 2019-D023. As a result, this information collection is being revised to remove the public burden associated with these provisions, as identified in the table below:

Public Burden Previously Approved for DFARS 252.211-7004 and 252.211-7005		
	252.211-7004	252.211-7005
Number of respondents	375	10
Responses per respondent	1.5	1
Number of responses	563	10
Hours per response	2	1
Estimated hours	1,126	10
Cost per hour (hourly wage)	\$32	\$32

Annual public burden ii. <i>Increased Cost Per Hour.</i>	\$36,032	\$320.00
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The estimate of public burden for DFARS clause 252.211-7007 is changed due to an increase in the GS hourly base rate from calendar year 2016 (\$28.14) to calendar year 2020 (\$29.98). As a result, the Cost per Hour (including the fringe benefit rate) increased by \$3, from \$38/hour in 2016 to \$41/hour in 2020. The total change in public burden associated under this OMB Control Number 0704-0398 is in the table that follows.

Total Change in Public Burden: 2016 to 2020			
0704-0398 TOTAL	2016	2020	Difference
Number of respondents	641	256	-385
Total annual responses	65,573	65,000	-573
Total estimated hours	17,386	16,250	-1136
Annual public burden	\$653,852	\$666,250	+\$12,398

16. Publication of Results

Results of this collection will not be published.

17. Non-Display of OMB Expiration Date

DoD does 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.