

PUBLIC SUBMISSION

As of: 10/16/20 9:47 AM Received: October 14, 2020 Status: Draft Tracking No. 1k4-9jil-ch0t Comments Due: October 26, 2020 Submission Type: Web
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Docket: GSA-GSA-2020-0001
GSA Information Collections -2020

Comment On: GSA-GSA-2020-0001-0008
Federal Funding Accountability and Transparency Act Subaward and Executive Compensation Reporting Requirements

Document: GSA-GSA-2020-0001-DRAFT-0006
Comment on FR Doc # 2020-18613

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General Comment

Whether this collection of information is necessary?

From the perspective of a federal contractor, the FFATA subaward and executive compensation reporting requirements is not used to support any contractual requirement. Also from our perspective, the contracting officers are unaware of the requirement. Which begs the question, who is this information really for?

Whether it will have practical utility?

From the perspective of a federal contractor, it has little to no practical utility. Further, the requirement to disclose first tier information is not a mandatory flowdown (52.204-10) to subcontractors nor is SAM.gov registration a mandatory flowdown (52.204-7 and 52.204-6) which impedes the electronic reporting process in FSRS.gov. We can only report on a first tier subcontractor in FSRS when registered in SAM.gov with a DUNS number. There is no other alternative to electronically report the information when they are not registered in SAM.gov with a DUNS number.

Whether our estimate of the public burden accurate and based on valid assumptions and methodology?
Yes on average it takes approximately one hour for each subaward to be reported in FSRS.gov.

Ways to enhance the quality, utility, and clarity of information collected?

We recommend the following enhancements:

Require the clauses be mandatory except for overseas vendors.

Exempt overseas subawards from reporting.

Update the system to not rely on DUNS numbers in order to be able to report electronically.

Ways in which we can minimize the burden of the collection of information on those who are to respond, through the use of appropriate technological collection techniques or other forms of information technology?

We recommend changing the reporting cycle from monthly to annually.