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Invoice Submissions by Contractors for NRC Contracts/Orders

Comment On: NRC-2021-0210-0001

Information Collection: Invoice Submissions by Contractors for NRC Contracts/Orders

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Comment on FR Doc # 2022-08145

Submitter Information

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General Comment

1. Is the proposed collection of information necessary for the NRC to properly perform its functions?

Does the information have practical utility?

The types and extent of data required is generally consistent with that required to determine the validity of the reimbursable costs and is otherwise consistent with other agencies and firms awarding cost-reimbursable work. We believe it is incumbent upon both the contractor and government to have a high level of assurance of its validity.

2. Is the burden estimate accurate?

Our firm has been submitting our data for NRC cost-reimbursable contracts for approximately 19 years. Once the initial effort of establishing the data collection and invoicing processes was expended, the ongoing effort was in the same order of magnitude as that in the FRN. The variable in the burden comes from the G&A and OH labor costs of the contractor's requirements to demonstrate due-diligence in verifying the actual costs of part-time and full-time (duration of project) subcontractors. This latter factor should be further considered as a variable impact for which the administrative effort should be consistently subject to direct labor cost reimbursement.

3. Is there a way to enhance the quality, utility, and clarity of the information to be collected?

No recommendations

4. How can the burden of the information collection be minimized, including the use of automated collection techniques or other forms of information technology?

Our firm currently uses electronic time keeping which directly inputs to our invoicing accounting, payroll, accounts payable, and data transmittal to NRC. Any further automation to provide raw, monthly incurred cost data directly to NRC has several aspects which requires caution. First, the contractor has a responsibility to assure the data is accurate and conforms with the contract provisions. Providing a method of submittal which does not afford a suitable opportunity for the contractor to apply their due diligence to the information submitted is inappropriate. Further, the diversity in the data collection, processing, invoice preparation and electronic accounting systems across the spectrum of NRC and its

contractors begs the question of whether an IT curative solution for minimizing burden might not be so difficult as to have the unintended consequences of increased burden and contractor costs.