

PUBLIC SUBMISSION

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Information Collections

Comment On: FAR-2012-0076-0085
Agency Information Collection Activities; Proposals, Submissions, and Approvals; Federal Acquisition Regulation; Commercial Item Acquisitions; OMB Control No. 9000-0136

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Submitter Information

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Organization: Johnson & Johnson Health Care Systems, Inc.

General Comment

See attached file(s)

Attachments

ORCALetterofResponseJ&J5.28.13final

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May 28, 2013

General Services Administration
Regulatory Secretariat (MVCB)
1275 First Street, NE, 7th Floor
Washington, DC 20417
Attn: Hada Flowers/IC9000-0136 Commercial Item Acquisitions

Reference: Information Collection 9000-0136, Commercial Item Acquisitions
FAR provision 52.212-3: Offeror Representations and Certifications

Dear Ms. Flowers:

Johnson & Johnson Health Care Systems Inc. is pleased to provide comments on the above notice on behalf of itself and more than twenty-five domestic Johnson & Johnson operating companies who sell to the federal Government. The J&J Companies invest substantial resources in completing, validating, and maintaining their individual registrations in the Systems for Award Management (SAM), including the responses to the Representations and Certifications (formerly, the On-line Representations and Certifications Application). We are writing to express our concern that the General Services Administration has substantially underestimated the time burden associated with efforts to collect, review, and enter the required data for the representation and certifications in SAM.gov. The experience of the J&J companies indicates instead that the time burden is well over the estimated 30 minutes per response.

In particular, the estimate fails to address the following actions required to provide current, accurate and complete responses. Each of the items listed below requires identifying and coordinating with the appropriate company employee who is the custodian of such information in order to ensure that each response is accurate and complete.

- (1) Research company data regarding the civil and criminal matters, and the extent to which they may be related to government contracts, requiring both paralegal and attorney resources to first identify potentially reportable matters then to determine whether those matters meet the broad definitions provided;

- (2) Gather and certify to the information regarding the size, socioeconomic status, and business structure of our companies, which may change over time due to corporate restructuring;
- (3) Gather and certify to certain business practices of our companies;
- (4) Manually enter a substantial number of places of performance information for our companies, such number increasing in proportion to the number of products sold by each company;
- (5) Manually enter substantial data regarding end product and Country of Origin – multiple entries are made one at a time after validating up-to-date supply chain information;
- (6) Resolve system issues through the SAM help desk – at this time we have encountered multiple system issues requiring such tickets and resolution.

Johnson & Johnson companies have implemented controlled processes to address the representations and certifications requirements to ensure our responses are current, accurate and complete. In preparing our comments, we surveyed eight Johnson & Johnson operating companies that have recently submitted a SAM record, and accordingly calculated the burden placed on our companies to complete the representation and certification section accurately. On average, the time burden is approximately 215 hours per company, per response, for the end-to-end process. Much of this time is spent reaching out to multiple contacts across the organization, gathering of the information, and manually entering the information into SAM.

We appreciate the opportunity to provide these comments. Please contact me directly (732) 562-3775 or gmanzell@its.jnj.com if you have questions or require clarification on the comments offered.

Regards,

Gina Manzella
Senior Analyst, Government Contracting
SAM Lead

Cc
Colleen Menges
Jessica Empestan