



March 31, 2010

GSA Desk Officer, OMB  
Room 10236, NEOB  
Washington, DC 20503

**RE: OMB Control No. 9000-00XX, Information Regarding  
Responsibility Matters**

Dear Sir or Madam:

The Coalition for Government Procurement appreciates the opportunity to comment on the request for public feedback regarding the collection of new information in compliance with section 872 of the Duncan Hunter National Defense Authorization Act of 2009 (Pub. L. 110-417), enacted on October 14, 2008. Section 872 of the Act requires the General Services Administration (GSA) to develop and maintain a database containing specific information on the integrity and performance of covered Federal agency contractors and grantees.

The Coalition for Government Procurement is a non-profit association of over **350 firms selling commercial services and products to the federal government**. Our members comprise small, medium, and large businesses actively engaged in federal business. Our members collectively account for approximately 70% of the sales generated through the GSA Multiple Award Schedules program and about half of the commercial item sales made to the government each year.

Under the Federal Awardee Performance and Integrity Information Systems (FAPIS) requirements, companies with contracts or grants exceeding \$10 million will be required to submit information on criminal, civil or administrative proceedings against them. Federal contracting officers will be expected to check the database when making a responsibility determination or

conducting a past performance evaluation for all new contracts worth more than \$500,000.

According to the request for comment, the final rule requires contractors to semi-annually update the information in FAPIIS. The notice estimates the number of hours for this initial response to be 0.1 hours, with 5,000 contractors affected. This estimate does not include the time necessary to maintain the company's information internally. The estimate does include an average of 100 hours per year for recordkeeping for each of the 5,000 respondents to the request for additional information, for a total of 500,000 annual recordkeeping hours.

It seems clear by issuance of the final rule on March 23, 2010, that no new burdens will be placed on industry to collect information. The final rule states that the government will merely reuse information it already possesses. The Coalition would oppose any new requirements put on industry to collect additional data. Such obligations would come with a cost to industry, that would inevitably result in a cost shift to the government.

We appreciate the opportunity to comment and are available to respond to questions or discuss the issues further.

Regards,



Mitch Vakerics  
Manager of Policy