

Supporting Statement for Paperwork Reduction Act Submission

A. **Justification:** SBA Form 1419, SBA Counseling Evaluation

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The Small Business Administration (SBA) is authorized to give grants for the operation of Small Business Development Centers (SBDCs) and to oversee the effectiveness of the SBDC program. See attached copy of §§ 21(a)(1), (a)(3) and (k)(1) of the Small Business Act (the Act). As outlined in § 21(c)(1) and (c)(3) of the Act, as part of their responsibilities under the grant, SBDCs are required to provide counseling to small businesses on a variety of business disciplines such as marketing, finance, accounting, management, regulatory compliance, and personnel. Counseling is one of the primary methods of providing assistance to the small business community. The information requested on Form 1419 is needed to plan, monitor, control and measure the quality and impact of counseling provided by these resource partners. Once the counseling service is received by the client, he or she is asked to complete a “SBA Counseling Evaluation” form to give his or her opinion of the counseling service received.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The “SBA Counseling Evaluation” form is collected by the SBDC lead centers’ management staff from the SBDC clients who have received counseling from the centers.. The management staff of each SBDC uses the form as a review mechanism to ascertain the quality of service given by each counselor. The information on the form is used to ascertain if the counselors are properly defining and identifying the problem areas as told by the small business client. The information also helps SBDCs to determine if the counselors are using the appropriate business protocols to initiate business solutions for each client. In addition, the SBA project officers use these forms in their monitoring responsibilities.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

Currently, SBDCs do not use a uniform direct automatic electronic delivery system to collect this type of data from their clients. This counseling evaluation form is currently available at: www.sba.gov/library/forms. The Office of Small Business Development Centers (OSBDC) encourages SBDCs to email the forms to their clients that have access to the internet, and have these clients email or fax it back to the Lead SBDC.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

Information obtained from the “SBA Counseling Evaluation” form is not repetitive or duplicative of any other form. Presently, each SBDC collects counseling information that is unique to each counseling session and to the small business community it serves; therefore, duplication of information is minimal. Currently, OSBDC has no knowledge of any other existing agency data collection efforts or mechanisms to obtain the information requested on the form.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

The SBDC's approach to collecting this information avoids unnecessary duplication and has minimal burden on the client that will receive the counseling service. The “SBA Counseling Evaluation” form uses plain English and unambiguous terminology that is understandable to the small business entrepreneur. The burden of completing the form is minimal; it takes approximately 10 minutes to complete.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reduce burden.

Without this information collection effort, the SBDCs would have difficulty in obtaining information needed to support the requirement of meeting the small business community counseling requirements. Further, if the information is not collected SBA’s ability to evaluate the effectiveness of the SBDC counselors or the SBDC program generally would be greatly impaired. If the information was collected less frequently, the SBDCs would not receive accurate or credible feedback from their clients.

7. Explain any special circumstances. Explain any special circumstances that would cause an information collection to be conducted in a manner etc.

There are no special circumstances which require the collection of information in a manner inconsistent with the guidelines as stated on OMB Form 83-I.

8. Federal Register Notice. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency’s notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A request for public comments was published on May 26, 2009 at 74 FR 24887 (Volume 74, Number 99). SBA did not receive any comments.

9. Payment or Gift to Respondents. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

SBA will not provide any payments or gifts to respondents during this information collection, other than remuneration of contractors or grantees in accordance with the terms of the award.

10. Assurances of Confidentiality. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

This form does not collect any confidential information.

11. Questions of a sensitive nature. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to person from whom the information is requested, and any steps to be taken to obtain their consent.

No sensitive questions are asked.

12. Estimates of Hourly and Cost Burden

Approximately .17 of an hour (or 10 minutes) is required for the client to complete the requested information on the SBA Counseling Evaluation form. This estimate is based on previous surveys of clients using the form. We anticipate receiving no more than 15,000 client evaluations annually. Therefore, 15,000 contacts x 1 response x .17 (10 minutes) hours = 2,550 burden hours.

The average small business cost per respondent is based on the average hourly rate of approximately \$30 and the total burden hours of 2,550 hours for the 63 SBDC national network. This equates to a total cost/hour of approximately \$76,500.

Total number of estimated respondent contacts = 15,000
Frequency of respondent = 1
Estimated hours to complete the form per client = .17 (10 minutes)
Estimated Total Burden hours = 2,550
Average hourly cost = \$30

Cost Burden
Cost per respondent = \$30 x .17 = \$5.10
Total Costs = \$5.10(cost per response) x 15,000 (total Responses) = \$76,500

13. Start up or Capital costs. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information. Do not include hour cost burden from above.

There are no additional costs to the respondent.

14. Costs to the Federal Government. Provide estimates of annualized costs to the Federal Government. Also provide a description of the method used to estimate cost, including a quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

OSBDC estimates that General Schedules (GS-12 or 13) SBA Project Officers devote approximately 126 hours per year (approximately two hours per project officer) to review and analyze the form, which is part of their on site review duties. The total cost of \$4,410 is the estimated cost to the Federal Government. All forms remain at the Small Business Development Centers.

Federal Cost Burden	\$4,410
Total hours	126
Hourly cost	\$35
Number of SBDCs	63
Frequency of Response	1
126 hours/per year x \$35 (GS-12-13 hour rate) =	\$4,410

15. Program Changes or Adjustments. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

No changes or adjustments reported.

16. Publication of Information Collection. For collection of information whose results will be published, outline plans for tabulation and publication. Address complex analytical techniques. . Provide time schedules for the entire project. . .

Data will be used for internal reports only and will not be published.

17. Expiration Date. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why the display would be inappropriate.

The Agency is not seeking approval to not display the expiration date for OMB approval of this collection.

18. Exception to the Certification. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submission" of OMB Form 83-I

This certification does not encompass the efficient use of statistical survey methodology because as noted, it is inapplicable.

B. Collection of Information Employing Statistical Methods. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used.

Not applicable.