

Department of the Treasury, Departmental Offices  
Supporting Statement and Request for Clearance  
Small Business Lending Fund – Small Business Lending Survey

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 Office of SBLF Program Oversight was created through §4107 of the Small Business Jobs Act of 2010, Public Law 111-240 (Act). A Special Deputy Inspector General for SBLF Program Oversight is responsible for audit and investigations related to the SBLF program; and must report at least twice a year to the Secretary of the Treasury and Congress on the results of oversight activities, including recommended program improvements. In addition to the above survey, Treasury OIG seeks to survey SBLF recipients on what specific factors contributed to their use of the SBLF funds.

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.

This is a new information collection. All current SBLF participants (328) will be surveyed to obtain their viewpoints of the SBLF program, its administration and what specific factors contributed to their use of the SBLF funds. This is necessary for us to carry out the oversight responsibilities assigned to us by the Act.

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.

Survey responses will be submitted through email using a fillable PDF.

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.

The Treasury OIG survey is intended to ‘drill down’ on SBLF recipients’ viewpoints as to what factors contributed to their use of the SBLF funds. This information is not available from any other source and the SBLF Lending Survey did not solicit this type of information. This OIG

survey will request information that is not publicly available, has not been previously provided to Treasury, and can only be obtained through individual responses from the SBLF participants.

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 participating institutions range in size from small financial institutions with assets of \$7 million up to \$10 billion. The information collection imposes only minimal burdens, approximately 2 hours, because the information requested is readily available to the institutions and consist mainly of officers' opinions and viewpoints.

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 reducing burden.

If the information is not collected, Treasury OIG will not be able to determine what factors contributed to SBLF participants' use of the SBLF funds, and will be unable to carry out the oversight responsibility assigned to us by the Act.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with OMB guidelines.

Not applicable

8. 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 in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. 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.

We did not solicit comments on this information collection. We are requesting an expedited clearance for three reasons. First, under §4107 of the Act, the Special Deputy Inspector General for SBLF Program Oversight is responsible for audit and investigations related to the SBLF program; and must report at least twice a year to the Secretary of the Treasury and Congress on the results of oversight activities, including recommended program improvements. We are concerned about meeting this requirement timely and for 2013 and would therefore request to expedite the clearance process for this information collection. Second, The SBLF program had its one-year anniversary in September 2012, and we would like to report on the program's results one year after implementation. If the information collection occurs later in 2013, we would need to update an extensive amount of audit work that relies on figures as of September 2012 and it

could delay our report. Finally, this information collection requests respondent's opinions and viewpoints and has an estimated time burden of 2 hours which is relatively modest. We did not consult with persons outside the agency regarding the survey but plan to test it with a small number of SBLF banks and make appropriate revisions prior to sending it to the entire population.

9. Explain any decision to provide any payment or gift to respondents, other than reenumeration of contractors or grantees.

Not applicable.

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

In the "Freedom of Information Act" section of the instructions for the survey, respondents are provided with the following information:

Respondents are notified that this survey, as a record of the Office of the Special Deputy IG for SBLF Program Oversight, may be subject to requests for disclosure made under the Freedom of Information Act, 5 U.S.C. Section 552. It is the policy of the United States Government and this office to make public records available unless a disclosure exemption incorporated in the FOIA is specifically applicable. Information provided in this survey that qualifies as proprietary information under Exemption 4, 5 U.S.C Section 552(b)(4), will not be released in response to a FOIA request or otherwise be made available without consultation with the information provider. For further information, contact the Office of Counsel, Treasury Office of Inspector General, 740 15<sup>th</sup> Street, N.W., Washington, D.C. 20220, 202-927-0650, [OIGCounsel@oig.treas.gov](mailto:OIGCounsel@oig.treas.gov).

11. 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 persons from whom the information is requested, and any steps to be taken to obtain their consent.

Not applicable.

12. Provide estimates of the hour burden of the collection of information.

Treasury OIG estimates that the survey will take approximately 2 hours to complete (25 questions requiring respondents to check an answer at 2 minutes each and 13 fill-in areas at 5

minutes each) and 100 percent of 328 current SBLF participants = 328 will respond to the survey. The total estimated burden for the collection is 328 institutions x 2 hours = 656 hours.

13. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

Treasury OIG estimates that there will be no annualized capital/start-up costs for the respondents to collect and submit this information. In addition, the information collection imposes only minimal burdens, because the information requested is readily available to the institutions.

14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include 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. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

Treasury OIG estimates that there will be no annualized capital/start-up costs for the government to receive this information.

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

Not applicable. This is a new information collection.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Survey responses will be due to Treasury OIG by January 18, 2013. Treasury plans to publish a report including summaries of the responses in February/March 2013.

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

Treasury OIG does not object to displaying the expiration date of the information collection.

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

There are no exceptions to the certification statement in item 19 of Form 83-I.