Supporting Statement for Paperwork Reduction Act Submission
Small Business Administration
Boots to Business Post Course Surveys

A: JUSTIFICATION

1. Circumstances necessitating the collection of information

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, Office of Veterans Business Development (OVBD) is authorized to formulate, execute and promote policies and programs of the Administration that provide assistance to small business concerns owned and controlled by veterans and small business concerns owned and controlled by service disabled veterans per section 32 of the Small Business Act.

The Secretary of Labor, in conjunction with the Secretary of Defense, the Secretary of Homeland Security, and the Secretary of Veterans Affairs is required by 10 U.S.C. § 1144 (b) (5) to establish and maintain a program to, among other things, "provide information and other assistance to separating military service members in their efforts to obtain loans and grants from the Small Business Administration and other Federal, State, and local agencies." As part of the Transition GPS Program, the Secretary of Defense is also required by 10 U.S.C. § 1142 (b) (13) to provide to such service members "information concerning veterans small business ownership and entrepreneurship programs of the Small Business Administration.", in 2011 Congress passed the "VOW to Hire Heroes Act of 2011, Pub. L. 112-56 Title II, §§ 201-265, 125 Stat. 711, 713, which included steps to improve the existing Transition Assistance Program (renamed Transition GPS) for Service Members. Among other things, the VOW Act made participation in several components of Transition GPS mandatory for all service members.

Boots to Business is an entrepreneurial education initiative offered by the U.S. Small Business Administration (SBA) as a career track within the Department of Defense's revised Transition GPS curriculum to comply with these statutory requirements. It is one of three optional training tracks within Transition GPS. The Boots to Business curriculum provides valuable assistance to the transitioning service members exploring self-employment opportunities by leading them through the key steps for evaluating business concepts and the foundational knowledge required for developing a business plan. Participants are also introduced to SBA resources available to help access startup capital and additional technical assistance.

During transition, transitioning service members and their spouses may select the Entrepreneurship Career track two-day workshop. Veterans who have already transitioned may attend the Boots to Business Reboot two-day work shop which covers the same material as the traditional Boots to Business course.

2. <u>How, by whom, and for what purpose information will be used</u>
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 online post course surveys will be deployed to all Boots to Business participants via email upon course completion. This voluntary collection enables the program office to assess both the quality of the Boots to Business courses and outcomes, to include job and business creations, achieved by participants after attending Boots to Business. The data will be used for overall program management, continuous improvement initiatives, and reporting outcomes to better serve veteran entrepreneurs. Survey results have been used to make curriculum changes or adjustments to methods of instruction, helping to ensure we better serve those who attend our workshops. Information used for reporting will be done in the aggregate and will not include Personally Identifiable Information (PII).

3. <u>Technological collection techniques</u>
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 the burden.

The post course surveys are online, web-based forms, permitting electronic responses, ultimately decreasing the burden on respondents. Respondents will receive a link to the surveys via email.

4. <u>Avoidance of Duplication</u>
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.

Currently, Boots to Business participants are surveyed via a hardcopy DOD Transition Assistance Program evaluation. Data is provided to SBA on a quarterly basis but does not focus on Boots to Business and does not capture the data needed to report effectively on the program. OVBD receives this data because the Boots to Business “Introduction to Entrepreneurship” course is an elective track available to transitioning service members within the DOD Transition GPS Program. In order to avoid duplication, the Transition GPS Program survey data will be used in conjunction with the data collected from the post course surveys to further confirm findings related to the quality of Boots to Business. The post course surveys avoid requesting the same information as the DOD Transition GPS Program class evaluation.

5. <u>Impact on small businesses or other small entities</u>
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.

Some of the respondents to this information collection, particularly the outcome assessment portion, might be small business owners. However, the de minimis time commitment for responding to the survey will not have a significant economic impact on the approximately 3,000 estimated respondents.

6. <u>Consequences if collection of information is not conducted</u>
Describe the consequence to the 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.

The Office of Veterans Business Development is required to report outcomes of the program and the post course surveys will provide valuable data that will help satisfy this requirement. If this collection is not conducted and feedback from program participants is not solicited on course quality, SBA's ability to understand pain points and target areas for improvement would be impaired. The data collected from these surveys will assist OVBD to understand if the program office is achieving goals as outlined for the agency. Specifically, the Course Quality Survey allows OVBD to understand the effectiveness of the course, as well as strengths and areas for improvement as it relates to trainer and course quality. These data will support continuous course quality improvement. The Outcome Assessment helps OVBD understand the long-term impact of the program and how the program may support transitioning service members in their endeavor to start a small business. Understanding what program participants go on to do after completing the course and gathering information on the percentage of course participants who start a business aligns with the overarching goals of the agency.

7. <u>Existence of special circumstances</u>
Explain any special circumstances that would cause an information collection to be conducted in a manner:
- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use;
- requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special circumstances.

8. Solicitation of Public Comment
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 comments received. Describe efforts to consult with persons outside the agency to obtain their views…

To obtain views of persons outside the agency, a 60-day Federal Register Notice was published on May 25, 2018, at 83 FR 24383. No comments were received.

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

None.

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

During the registration process for a Boots to Business course, registrants are asked to permit SBA to use their name and contact information for SBA surveys and information mailings as part of the Boots to Business alumni network. In addition, the *Use of Information* paragraph on the first page of the survey informs respondents that the information provided is protected to the extent permitted by law including the Privacy Act of 1974, as amended (5 U.S.C. 552a and the Freedom of Information Act (5 U.S.C. 552). That section also outlines the purpose of the surveys, why SBA needs the information and how the information is maintained in the agency's system of records, specifically SBA 5 - "Business and Entrepreneurial Initiatives for Small Businesses" and SBA 39 - "Veteran Programs Training and Counseling Records."

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

Information such as race, ethnicity, transition type, years of service and age range are requested only on the Outcome Assessment survey so we may identify trends among veterans in various demographics who successfully started a business after completing a Boots to Business course. In addition, business information such as financing obtained, number of employees, legal entity and official designations (i.e. HUB-Zone) is requested to further understand where veterans are finding success. All requests for information on the surveys are voluntary.

12. Estimate the hourly burden of the collection of information
Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated...

Based on past experience with the surveys, approximately 3,000 annual respondents are expected. The annual hour burden is determined to be 500 hours. The estimate is based upon a consultation with 4 individuals who tested the draft surveys, averaging 5 minutes for completion. The 3,000 respondents will spend 10 minutes completing the surveys per year.

The average total annual cost burden to the expected number of respondents is $10,720.57 based on the expected value of participant pay grades. The estimate is based on the average annual salary (38,594.05) of transitioning service members according to DOD and the 10 minutes required to complete the surveys.

13. The total annual cost burden
Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14. The cost estimate should be split into two components: (a) a total capital and start-up cost component and (b) a total operation, maintenance and purchase of services component….

There are no additional costs as a result of this information collection.

14. Annualized Cost to the Federal Government
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.

There is minimal cost to the Government as this form will be online where respondents will submit their information electronically.

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

Based on the previous three years of data collection, the Office of Veterans Business Development has a better understand the average amount of respondents to the survey. Our current estimates reflect the approximate annual number of respondents, and is a more accurate representation of how many respondents are expected to complete the survey. This revision is a significant reduction in hours and expense.

16. Collection of information whose results will be published.
For collection of information whose results will be published, outline plans for tabluation and publication. Address complex analytical techniques… Proivide time schedules for the entire project…

Any reporting of the collected information will be at the aggregate level and not contain individual PII.

17. <u>Expiration date for collection of information</u>
If seeking approval to not display the expiration date for OMB approval of the information collection, excplain the reasons why the display would be inappropriate.

Not applicable. The expiration date will be displayed.

18. <u>Exceptions to certification in block 19 on OMB Form 83-I</u>
Explain each exception to the certifcation statement identiifed in Item 19, "Certification for Paperwork Reduction Act Submission," of OMB Form 83-I

No exceptions.

B. <u>COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS</u>
1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used.

The respondents who will be selected for the post course surveys extends to all service members, veterans and dependents that have completed any of the Boots to Business courses (approximately 13,000 class attendees, annually). There is no sampling as all participants will receive the surveys after course completion. In addition, the method used to collect this information is an online survey that respondents will receive via email. The expected response rate is approximately 15% based on average data collection response rate for the past three years. The post course surveys are completely voluntary.

<u>2. Describe the procedures for the collection of information.</u>

The surveys are sent out to program participants who agreed to share their contact information via email. The Course Quality Survey is administered immediately after the course has occurred, so most of the respondent population will be transitioning service members and spouses. The Outcome Assessment will be administered to program participants one year after the course has occurred in which case the respondent population will be veterans who may have become small business owners. Each program participant will receive a maximum of two surveys per year. Data are collected and stored in an online survey platform.

3. <u>Describe methods to maximize response rates and to deal with issues of non-response.</u>

Although the surveys are completely voluntary, email reminders will be sent to deal with issues of non-response. A maximum of two email reminders will be sent within the three-week period following the initial invitation. In addition, the value of the survey is communicated to participants throughout all the Boots to Business courses. The email sent to respondents was also modified from a text-based email to an HTML email to be more visually appealing and interesting to potential respondents.

4. Describe any tests of procedures or methods to be undertaken.

A test of procedures and methods was completed with 4 individuals to better refine the surveys language and minimize the burden. On average, the potential respondents completed each survey in 5 minutes.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

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