

U.S. Small Business Administration
Counseling Information Form and Management Training Report
OMB Control No. 3245-0324
Justification – Part A Supporting Statement

Overview of Information Collection:

SBA is requesting a revision of Counseling Information Form & Management Training Report information collection (OMB Control No. 3245-0324). This information collection consists of SBA Form 641, Counseling Information Form, and SBA 888, Management Training Report for the NEXUS system.

Training and counseling topics were revised to better align with current industry trends and emerging technology solutions, with topics being removed, re-categorized, or newly introduced as appropriate. To ensure more inclusiveness, demographic questions were revamped. Overall, these updates aim to streamline the intake process, reducing the administrative burden to allow greater focus to delivering training and counseling services. A more detailed list of all changes to both SBA form 641 and SBA form 888 can be found in the Appendix of this document.

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

The U.S. Small Business Administration's (SBA) statutory mission is to "aid, counsel, assist and protect, insofar as is possible, the interests of small business concerns." The Agency's Office of Entrepreneurial Development (OED), Office of Veterans Business Development (OVBD) help to carry out this mission by providing training and counseling programs through Resource Partners (such as SCORE, Small Business Development Centers, Veterans Business Outreach Centers, and Women's Business Centers) to existing and prospective small businesses. These programs are funded by grants or cooperative agreements.

The recipients of these awards are required by the terms of their Notice of Award and outlined in each program's Notice of Funding Opportunity to collect the information on SBA Form 641 from each small business or prospective small business that receives one-on-one counseling or advisory services and to collect the information on SBA Form 888 for training events. SBA's Resource Partners submit this information to SBA via the Nexus System.

SBA must collect information in order to comply with sections 10, 21, 22, and 29 of the Small Business Act (15 U.S.C. §§ 639, 648, 649, and 656 respectively) which pertain to the information and reporting requirements for these programs. Excerpts of the pertinent texts from these sources are attached.

2. How, by whom, and for what purpose information will be used

The recipients of SBA counseling and training grant awards are required by the terms of their Notice of Award and as outlined in each Program Announcement, to collect the information on SBA Form 641 (Counseling Information Form) from each small business or prospective small business that receives one-on-one counseling or advising, and to collect the information on SBA Form 888 (Management Training Report) for each group training session. SBA's Resource

Partners submit this information to SBA via the Nexus system. This information is required to be submitted to SBA no less than quarterly; however, the frequency could happen as often as daily.

The information is pertinent to management's analysis of each OED program or activity funded by SBA and assists SBA in evaluating the impact of each program or activity. The information is also used to support SBA's budget requests, performance plans, evaluations and other submissions made to the Office of Management and Budget, the President and the Congress.

3. Technological collection techniques

SBA is committed to promoting the use of technology to lessen the burden of data collection. SBA allows and encourages the Resource Partners to collect this information via their own electronic database systems. Additionally, SBA has an electronic system that permits Resource Partners to use SBA Forms 641 and 888 to transmit the data electronically to SBA. This electronic system greatly lessens the burden on respondents and SBA, ultimately allowing for more efficient services for our clients. Approximately 75% of the responses will be collected electronically.

4. Avoidance of Duplication

The information is unique to the programs identified above and is not collected in other programs at SBA or elsewhere. Each report provides new data on activities that happened during the reporting period; that data cannot be substituted for any other period. OED has worked with other SBA program offices to ensure the requested information is not being collected through other sources and/or partners.

5. Impacts on Small Businesses or Other Small Entities

This data collection obtains information from the approximately 733,434 small businesses that receive counseling, advising, and/or training from SBA's Resource Partners. In many instances, SBA Resource Partners collect information via an online platform, which reduces the burden on small businesses. The SBA is only requiring information that would be necessary to provide adequate business assistance the small business seeks and has worked with its Resource Partners to eliminate questions that are unnecessary.

6. Consequences if collection of information is not conducted

The data collected is critical to SBA's ability to meet regular statutory reporting requirements and performance management functions. As the grants provided to these partners exceed \$200 million annually, it is critical that SBA collects this information for proper management and oversight of the programs. Without the data collection, SBA will be unable to effectively manage the counseling and training programs. If the information were collected less frequently, SBA would not be able to intervene in a timely manner when performance issues arise.

7. Existence of special circumstances

There are no special circumstances for this collection. While SBA Form 641 requests Resource Partners to collect confidential and proprietary information, including contact information (name, physical address, email, and phone number) and business information, (number of employees,

gross revenues and sales), this information is protected to the extent permitted by law. Training data collected on SBA Form 888 is reported to the SBA only in aggregate form. This data is required to respond to specific mandates in Section 29 of the Small Business Act (15 U.S.C. 656), and to generate data on SBA's counseling and training programs for reports to the U.S. Congress and the President. The data collected on both SBA Forms 641 and 888 is used by Resource Partners – including SBDCs, SCORE, VBOCs, and WBC – to report metrics toward those goals. Section 29 of the Small Business Act (15 U.S.C. 656) mandates that the SBA submit to the Committees on Small Business of the House of Representative and the Senate a Management Report on the effectiveness of all projects conducted under the Women's Business Center Program; this report consists of the data collected on both SBA Forms 641 and 888. Only the client, SBA management officials, and the Resource Partner providing the counseling service have access to confidential and proprietary information, protecting the integrity of the data. SBA has instituted procedures to protect confidentiality to the extent required by law.

8. Solicitation of Public Comment

SBA published a 60-day notice in the Federal Register on 06/16/2025 at 90 FR 25420. All comments were due on or before 08/15/2025. Public comments (17 total) primarily focused on improving usability and relevance of the form, including simplifying or eliminating duplicative and overly complex fields, removing outdated elements (e.g., fax number), and reconsidering the need for Form 888. Commenters also recommended modernizing the form by incorporating current training topics, such as "Artificial Intelligence." The largest number of comments were related to suggested discontinued use of Form 888, revising the categories of types of primary counseling assistance being sought, simplifying the form, and eliminating outdated fields (e.g., fax number, race and citizenship). The SBA will continue to utilize Form 888 to collect training reporting. In response to comments received, SBA reduced and streamlined the list of counseling topics in Part I of Form 641, from 20 to 13, focusing on the most relevant areas to simplify the form and improved clarity and ease of navigation. The "Artificial Intelligence" counseling topic was added to Part I and Part III of the Form 641. Commenters requested session-level reporting should continue, particularly for initial client engagements, as it supports accountability, impact tracking, and funding justification. As a result, the "Type of Session" block of the form was improved. The detailed changes to both forms are listed in Appendix A.

9. Payment of gifts

No payments or gifts will be made to respondents.

10. Assurance of Confidentiality

The primary purpose of collecting this information is to support the SBA's ongoing improvement of business counseling programs, ensure effective oversight and management of entrepreneurial development programs and grants, and meet Congressional and Congressional and Executive Branch reporting requirements. Providing the requested information is required to obtain and/or retain benefits. Routine uses of this information are established in SBA's Revision of Privacy Act System of Record, SBA 11, Entrepreneurial Development Management Information System published on April 1, 2009, at 74 FR 14890. Any personal information collected will be

protected to the extent permitted by law, including the Privacy Act of 1974 and the Freedom of Information Act (FOIA). In addition, to the extent permitted under FOIA, confidential business information (CBI) will only be disclosed to contractor or Agency personnel assigned to work on these programs. Any Person concerned with the collection of this information, disclosure or routine use under the Privacy Act may contact the Freedom of Information Privacy Acts Office, Small Business Administration, 409 3rd St., S.W., Washington, D.C. 20416. The data is stored at SBA in Nexus, which is password protected and accessible only to Resource Partners and SBA. In addition to requesting consent to use their names, SBA Form 641 also notifies respondents that information will be kept confidential. The SBA Form 888 does not request any Personally Identifiable Information or CBI. Information or CBI.

11. Questions of a sensitive nature

In this data collection, individuals will be asked for the following information (Form 641 only), which may be considered sensitive: sex, citizenship status, military status, disability status, and information about their businesses' financial situation, including revenue and financing obtained. SBA Form 641 contains a consent statement that describes how the information they provide will be handled. The information collected is in response to statutory mandates and to facilitate compliance with various reporting requirements. Additionally, it is essential to the mission of the agency and to monitoring business performance. SBA only reports the data in aggregate in these reports. Any sensitive information disclosed to SBA is maintained in a Privacy Act System of Record, SBA-11, Entrepreneurial Development Management Information System, which was last published at 74 FR 14901-14902 (April 1, 2009).

12. Estimate the hourly burden of the collection of information

The form 641 collects data on counseling clients of Women's Business Centers, Small Business Development Centers, SCORE, and Veterans Benefit Outreach Centers. The form 641 is filled out by both the client who has requested counseling and the counselor at the center who is working with a client. The client does not fill out the SBA Form 888. The SBA Form 888 is filled out by the training coordinator who is an SBA grantee. SBA estimates the total annual burden for both forms to be 449,317 hours. The total annualized hour and costs burdens are set out below in Exhibit 1. As these forms are currently in use, the burden is based on the current burden experienced by respondents. The minor revisions of the form will not change the burden per respondent. The cost burden of SBA Form 641 is based on an estimated median annual income of \$70,484 for small business owners in 2026, which equates to an hourly rate of \$39.09¹ and an estimated median annual income for counselors of \$66,730 which equates to an hourly rate of \$32.08.

¹ See http://www.payscale.com/research/US/Job=Small_Business_Owner_%2F_Operator/Salary.

Exhibit 1. Information Collection Burden Estimates

SBA Form	Number of Respondents	Frequency of collection	Average Minutes Spent	Total Burden in Minutes	Total Burden (hours)	Cost Estimate per hour	Total Cost Burden
Form 641							
First Visit	680,000	1	15	10,200,000	170,000	\$ 39.09	\$ 6,645,300
Follow-Up Visit	1,650,000	1	10	16,500,000	275,000	\$ 32.08	\$8,822,000
SBA Form 888	37,000	1	7	259,000	4,317	\$ 32.08	\$138,489

Average Burden per Response:

	Time Per Response	Hours Per Response	Cost Per Response
Reporting	11 minutes	.183 hours	\$6.59
Record Keeping			
Third Party Disclosure			
Total	11 minutes	.183 hours	\$6.59

Annual Burden:

	Annual Responses	Annual Time Burden (Hours)	Annual Cost Burden (Dollars)
Reporting	2,367,000	433,950	\$15,598,530
Record Keeping			
Third Party Disclosure			
Total	2,367,000	433,950	15,598,530

13. Estimate the total annual cost burden for submission

See burden worksheet. There is no other annual cost burden to respondents or record keepers.

14. Annualized Cost to Federal Government

There is no cost to the federal government that would not have been incurred without this collection.

15. Explanation of program changes in Items 13 or 14 on OMB Form 83-I

Even though the amount of questions and overall annual burden hours have reduced, annual pay has slightly increased, resulting in an increase the annual cost burden.

	Requested	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Change Due to Potential Violation of the PRA	Previously Approved
Annual Number of Responses for this IC	2,367,000			734,000		1,633,000
Annual IC Time Burden (Hour)	433,950			-50,716		484,666
Annual IC Cost Burden (Dollars)	\$ 15,598,530			\$1,587,390		\$14,011,140

16. Collection of information whose results will be published.

The results of this information collection will only be published in summary form as a means of providing SBA management officials, the Congress and the President with reports on program activity and participant outcomes. The reports are typically quarterly.

17. Expiration date for collection of information

SBA plans to display the OMB expiration date.

18. Exceptions to certification in block 19 on OMB Form 83-I

SBA is not requesting any exceptions to the certification.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Not Applicable, statistical methods will not be used.

APPENDIX

SBA has made the following changes to Form 641:

Removed *DUNS or SAM Number* From top right corner of the form.

Q.1. *Organization* Removed.

Q.2. *Office City/State* Removed.

Q.6. *Country* Removed.

Q.13. *Primary Counseling Sought* Moved to Q.10; removed *Customer Relations; Business Accounting/Budget; Tax Planning; Franchising; Buy/Sell Business; Technology; Credit Counseling; Legal Issues; International Trade; Intellectual Property Training; and Other*. Renamed *Business Plan* to *Business Planning*; *Business Financing/Capital Sources* to *Financial Sources*; *Business Operations/Management* to *Operations/Supply Chain*; *Human Resources/Managing Employees* to *Human Resources*; *Business Financial/Cash Flow* to *Financial/Cash Flow*; *Marketing/Sales* to *Marketing*; *Cyber Security/Cyber Awareness* to *Cyber Security*. Added *Artificial Intelligence* and *CMMC*.

Q.14. *Race* Removed.

Q.15. *Ethnicity* Removed.

Q.19. *Military Status* moved to Q.14; removed *Branch of Service*.

Q.20. *Referred by* Moved to Q.15; removed *Magazine/Newspaper; Television/Radio; and Internet*. Added *APEX; VR&E; County Entity; City Entity; State Entity; Government Entity; Faith-Based Organization, Conference/Event, Mail, Social Media, Other Resource Partner, and Walk-In*.

Q.24. *Type of Business* moved to Q.20; added *Child Care* and *Food Supply*.

Q.25. *Business Ownership* Removed.

Q.26. *Conducting Business Online* Removed.

Q.27. *8(a) Certified* Removed.

Q28a. *No. of Employees* Moved to Q.21a.

Q28b. *Of total employees...* Moved to Q.21b.

Q.29a. *For your most recent full business year, what were your:* Moved to Q.22a; removed *+Profits/-Losses*.

Q.29b. *Amount of your Gross Revenue/Sales...* Moved to Q.22b.

Q.30. *Legal Entity* Moved to Q.23.

Q.34. *Country* Removed.

Q.44a. *As of the most recent full business year, what were the client's annual:* Moved to Q.36a; removed *+Profits/-Losses*.

Q.45. *SBA or Resource Partner Service Contributed to the Following*: Moved to Q.37; Certifications removed *SDB*; *SBA Financial Assistance* removed *Economic Impact Disaster Loan (EIDL)*; added *7(a)/504*, and *MARC Loan*.

Q.46. *What was the nature of the counseling you provided the client?* Moved to Q.38a; removed *Customer Relations*; *Business Accounting/Budget*; *Tax Planning*; *Franchising*; *Buy/Sell Business*; *Technology*; *Credit Counseling*; *Legal Issues*; *International Trade*; *Intellectual Property Training*; and *Other*. Renamed *Business Plan* to *Business Planning*; *Business Financing/Capital Sources* to *Financial Sources*; *Business Operations/Management* to *Operations/Supply Chain*; *Human Resources/Managing Employees* to *Human Resources*; *Business Financial/Cash Flow* to *Financial/Cash Flow*; *Marketing/Sales* to *Marketing*; *Cyber Security/Cyber Awareness* to *Cyber Security*. Added *Artificial Intelligence* and *CMMC*.

Q.47. *Referred Client to* Moved to Q.39; added *VR&E*; and *Department of VA*.

Q.48. *Language(s) Used* Removed.

Q.51. *Type of Session* Moved to Q.42a; removed *Face-to-Face*; *Telephone*; and *Online*; added *Counseling*.

Q.52c. *Travel Hours* Removed.

Q.53. *Counseling Notes*: Removed.

Appendix A: Removed attached *Country List Supplement* document.

Appendix B: Added *Jobs Created* definition.

Added new picklist Q.12. *Citizenship Status*.

Added new picklist Q.16. *Barriers to Success*.

Added Q.35c. *Total No. of Jobs Created*.

Added new picklist Q.38b. *Is the Client doing business in:*

Added new picklist Q.42b. *Delivery*.

SBA has made the following changes to Form 888:

Q.1. *Organization*: and *Organization City/State* Removed.

Q.6. *Location of Training* Moved to Q.5; removed *Country*.

Q.7. *Total Trained* Moved to Q.6; removed *Race*, *Ethnicity* and *Total Underserved Trained*.

Q.8. *Primary Training Topic* Moved to Q.7; removed *Customer Relations*; *Business Accounting/Budget*; *Tax Planning*; *Franchising*; *Buy/Sell Business*; *Technology*; *Credit Counseling*; *Legal Issues*; *International Trade*; *Intellectual Property Training*; and *Other*. Renamed *Business Plan* to *Business Planning*; *Business Financing/Capital Sources* to *Financial Sources*; *Business Operations/Management* to *Operations/Supply Chain*; *Human Resources/Managing Employees* to *Human Resources*; *Business Financial/Cash Flow* to

Financial/Cash Flow; Marketing/Sales to Marketing; Cyber Security/Cyber Awareness to Cyber Security. Added Artificial Intelligence and CMMC.