Supporting Statement for Paperwork Reduction Act Submission OMB Control Number 3245-0136 SBA Form 987, Disaster Survey Worksheet

A. Justification

The purpose of this submission is to request OMB reauthorization of the SBA Form 987, "Disaster Survey Worksheet."

- 1. <u>Circumstances that make the collection of information necessary.</u> The Small Business Administration is authorized to make loans to victims of declared disasters for the purpose of restoring their damaged property to, as near as possible, pre-disaster conditions. This authority is found in 15 USC 636 as amended, implemented by 13 CFR Part 123 (copies attached). SBA's Office of Disaster Assistance (ODA) has not changed any information gathering items on this form. ODA has revised some of the terminology to reflect field transformation changes. Area Offices now collecting survey information are referred to as Field Operation Centers (FOC).
- 2. How, by whom, and for what purpose information will be used. 13 CFR 123.3 establishes the minimum criteria necessary for the Agency to declare a physical disaster. SBA Form 987 is used by SBA's Office of Disaster Assistance (ODA) staff to record information regarding disaster damage. The information is gathered by questioning affected individuals about the extent of their damage and potential insurance recovery. State and local officials are also questioned to obtain information helpful for the decision process. With this information, ODA determines if sufficient damage has occurred to warrant a disaster declaration by the Administrator of SBA.
- 3. Technological collection techniques. Although the SBA 987 is in an electronic format, it is not filled out by the public. ODA representatives collect the information from public and State government officials in person after a disaster has occurred. The information is used to complete the form. ODA representatives who use electronic mobile devices collect information contained on the SBA 987. The data is temporarily stored on the remote devices and then transferred to a core database at a secure location through secure connections within the Disaster Credit Management System (DCMS). DCMS is a web-based system that supports all ODA loan-processing activities, including the disaster management, loss verification, legal, document management, and portfolio maintenance tasks.
- 4. <u>Efforts to identify duplication.</u> When other Federal Agencies are involved, joint surveys are conducted whenever possible. Information is not available before the disaster occurs. No other form used by the SBA collects this information.

- 5. <u>Impact on small businesses or other small entities.</u> Where possible, a visual-only inspection is made without the need to question the affected party. When this is not possible, questions are limited to very general information about damage sustained and insurance coverage in effect.
 - 6. Consequence if collection is conducted less frequently or is not conducted. If this information were not collected, ODA could not process disaster declaration requests because there would be no basis upon which to determine if sufficient damage has occurred to warrant a disaster declaration by the Administrator of SBA. Since this information is collected only after a written request for a disaster declaration is made by the Governor or Governor's authorized representative of the affected state, it cannot be collected less frequently.
 - 7. <u>Existence of special circumstances.</u> There are no special circumstances.
 - 8. <u>Solicitation of public comment.</u> ODA solicited comments in Federal Register Vol. 71, No. 180, page 54704-dated September 18, 2006 (copy attached). The comment period closed November 17, 2006, and no comments were received.
 - 9. Payments or gifts to respondents. There are no payments or gifts to respondents.
 - 10. <u>Assurance of confidentiality.</u> The information is not specifically linked to any person or entity neither is it retrieved by a personal identifier. Therefore, there is no need for assurances of confidentiality. The information is however, subject to the Freedom of Information Act (5 U.S.C. §552).
 - 11. Questions of a sensitive nature. No sensitive questions are asked.
 - 12. <u>Estimates of the hourly burden.</u> We estimate that an average of 40 individuals and businesses (respondents) are queried regarding damage to their property per survey. It takes an estimated 5 minutes per response, which is based on the actual experience of employees in the field who ask these questions.

The hour burden is based on survey activity for the 3 most recent fiscal years (FY 04, 05, and 06). Requests for Presidential and SBA Administrative declarations (both declined and approved) are calculated as these are the declaration types that require surveys. In the breakdown below, declines are listed separately because we track them separately; however, they are essentially either Presidential or Administrative declaration requests that were declined rather than approved, based on the criteria not being met.

			Presidential &	
	Presidential	SBA Administrative	Administrative	Total
<u>FY</u>	Declarations	Declarations	<u>Declines</u>	Surveys
04	41	30	2	73
05	21	35	1	57
06	25	39	2	66

Total surveys past 3 FYs = 196 divided by 3 = 66 average surveys per year 66 surveys x 40 respondents per survey = 2640 responses 2640 responses x .083 (5 minutes) per response = 219 hours

There are minimal financial costs to respondents. The cost estimate for a respondent is based on a GS-5, Step 1 (\$14.18 per hour), which is the level of expertise (minimal) that is required to respond to simple questions. The annual cost is calculated below:

219 hours x \$14.18 per hour = \$3,105 annual cost to respondents

- 13. <u>Estimate of total annual cost burden.</u> There are no additional costs beyond that identified in Item 12 above.
- 14. <u>Estimated annualized cost to the Federal Government.</u> We estimate that it takes approximately 10 hours to do the average survey. This information is based on actual experience. Agency burden hours are calculated below:

66 surveys x 10 hours per survey = **660 Agency burden hours**

The annual cost estimate for the Agency is based on the salary of a GS-11, Step 1, (\$26.00 per hour), which is the typical grade for an employee performing these surveys. The cost is calculated as follows:

660 total hours x \$26.00 per hour = \$17,160 Cost to the Government

15. Explanation of program changes or adjustments in Items 13 and 14 on OMB
Form 83-I. The estimated cost to the respondent of \$3,105 is an increase of \$60 from the last submission. The estimated cost to the Government of \$17,160 is a increase of \$232 from the last submission. This increase was caused by a change in the basic salary of these grade levels, which has increased since the last submission. The agency burden hours of 660 decreased by 90 hours from the previous submission due to less disaster declaration requests.

- 16. <u>Collection of information whose results will be published.</u> No publication is anticipated.
- 17. <u>Expiration date for collection of information.</u> ODA will display the expiration date.
- 18. <u>Exceptions to certification statement in Block 19 on OMB Form 83-I.</u> There are no exceptions to the certification statement.
- B. Collections of Information Employing Statistical Methods

N/A