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**Supporting Statement for Paperwork Reduction Act Submissions  
U.S. Department of Labor / Office of Small Business Program  
Small Business Program Information Management System**

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**Circumstances that make the collection of information necessary.**

The Office of Small Business Programs (OSBP) administers the Department of Labor's responsibilities to ensure procurement opportunities for small, small disadvantaged, women-owned, HubZone, and small disadvantaged veteran-owned small businesses, serves as the Department's central referral point for small business regulatory compliance information and questions, and manages the Department's minority colleges and universities program.

Federal agencies are required to promote procurement opportunities for small, small disadvantaged, and Section 8(a) businesses of the Small Business Act, as amended, (Public Law 95-507, Sections 8 and 15) and P.L. 100-656 (Sections 502 and 503). The Federal Acquisition Streamlining Act of 1994 (P.L. 103-355) mandates similar efforts for small women-owned businesses. Public Law 106-50 created the program for service-disabled veteran-owned small businesses. Public Law 105-135 established the HUBZone program and PL 85-536 established HUBZone goals. The Small Business Regulatory Enforcement Fairness Act of 1996 (P.L. 104-121) requires Federal agencies to make available to small businesses compliance guides and assistance on the implementation of regulations and directives of enforcement laws they administer. Executive Orders 12876, 12900, and 13021 direct Federal agencies to implement programs, respectively, regarding Historically Black Colleges and Universities, Educational Excellence for Hispanic Americans, and Tribal Colleges and Universities that are administered by the respective White House Initiative offices (in the U.S. Department of Education). Executive Order 13125 directs Federal agencies to ensure that Asian Americans and Pacific Islanders are afforded opportunity to fully participate in Federal Programs.

Further, Executive Order 13170 requires that Departments take a number of actions to increase outreach and maximize participation of small disadvantaged businesses in their procurements. Executive Order 13157 strengthens the executive branch's commitment to increased opportunities for women-owned small businesses.

**How, by who, and for what purpose will the information be used?**

The Small Business Programs Information Management System (SBPIMS) gathers, documents, and manages information for four Office of Small Business Programs constituent groups: Small Businesses, Trade Associations, Minority Colleges and Universities, Tribal Governments, and Other Key Populations. Via this system, the constituent groups have the opportunity to voluntarily provide to OSBP information about their organizations. The information is used by OSBP and DOL agencies to maximize communication with the respective constituent groups regarding relevant OSBP and DOL programs, initiatives, procurement opportunities, and compliance assistance; to track services and solicit feedback on customer service to group members; and to facilitate registration of group members OSBP-sponsored activities.

. **Use of automated electronic, mechanical, or other technological collection techniques or other forms of information technology.**

In compliance with the Government Paperwork Elimination Act, information for the SBPIMS is collected via an electronic website. Small Business Vendors, Minority Colleges and Universities, Trade Associations, and Tribal Governments will be able to visit the website and voluntarily complete an automated registration form. The advantages of using an on-line website are: easy access by the four constituent groups; uniform collection of data to better facilitate comparison and analysis; more manageable (paperless) method for retaining and retrieving constituent data; and accessibility for OSBP officials and DOL procurement officials.

. **Efforts to identify duplication.**

The small business component of the DOL SBPIMS is similar to the government-wide Central Contractor Registration (CCR) database of small businesses which is managed by the Small Business Administration. However, the DOL SBPIMS is designed to address specific DOL procurement needs (such as Job Corps) which are not addressed in CCR and to collect information on vendors who have particular interests in DOL procurement opportunities. Further, the volume of information on CCR limits its usefulness as an accessible, user-friendly search tool for meeting specific DOL procurement needs.

OSBP is not aware of any systems similar to the Trade Association, Minority Colleges and Universities, and Tribal Government components of the SBPIMS.

. **Impact on small businesses or other small entities.**

Many of the respondents to this information collection will be small businesses. To limit the burden, this information will be collected via automated web-based forms. However, this information collection does not have a significant economic impact on small entities.

6. **Consequences if the collection is not conducted or is conducted less frequently, as**

**well as technical or legal obstacles to reducing burden.**

If the information is not collected, the effectiveness of OSBP to serve the four identified constituency groups will be adversely affected. Compiling, updating, and tracking the information, as well as registering constituents for OSBP-sponsored activities, would need to be done manually. A manual system has already proven to be a labor intensive, time consuming process which produces incomplete, inaccurate results. Allowing constituency group members an opportunity to update their own identifying and capability information will insure that the information gathered is more accurate and timely.

**7. Special Circumstances.**

No special circumstances have been identified for this system. The collection of information complies with 5 CFR 1320.5.

**8. Public Consultation.**

In accordance with 5 CFR 1320.8(d), the Department published a 60-day pre-clearance notice in the FEDERAL REGISTER on October 30, 2007 (Vol. 72, No. 209, p. 61379) inviting interested parties to comment on the proposed extension of SBPIMS information collection aspects. No comments have been received in response to this notice.

**9. Decisions to provide payment or gift to respondents.**

No payments or gifts will be provided to respondents.

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

Respondents will be assured of privacy through the Privacy Act Notice which will appear in the SBPIMS.

**11. Additional justification for any questions of a sensitive nature.**

There are no questions of a sensitive nature.

**12. Estimate of the hour burden of the collection of information.**

This information is generally readily available and will not require extensive research.

The estimated hour burden is based on a pilot test of five small businesses conducted during the planning stages of the system and includes time to research and retrieve information. In the pilot, an average of seven (7) minutes was required to complete the registration information and an average of two (2) minutes was required to update the information. The number of respondents (1,000) and the number of responses (2,000) differ because it is likely that some respondents (approximately 1,000) will update their registration information more than once per year.

Registration for Small Business, Minority Colleges/Universities, Trade Association, and Tribal Governments:

1,000 initial responses	x .12 hours	= 120 hours	
1,000 update responses	x .03 hours	= 30 hours	
Total Hours			= 150 hours

Participants also have the opportunity to provide feedback and comments through a customer satisfaction survey that is also available on the website. This information collection is approved under OMB number 1225-0059; therefore, no burden here for this information collection activity.

The total annual burden hours costs to respondents or record keepers is anticipated to be \$5,388.00 (calculated by multiplying 150 hours by an average professional/manager hourly wage of \$35.92). [Source: United States National Compensation Survey, U. S. Department of Labor, Bureau of Labor Statistics, July 2003.]

**13. Estimate for the total annual burden hours costs to respondents or record keepers resulting from the collection of information.**

There are no anticipated costs for responding to this collection of information.

**14. Annualized cost to the Federal Government:**

1. Total Costs (Contractor Costs): \$0
2. Annual Maintenance Costs: \$0

No annual maintenance costs are anticipated.

**15. Reasons for program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.**

There is no projected change in burden.

**16. Plans for tabulation and publication.**

Lists of small businesses with identifying information will be provided to DOL agencies on an annual basis (internal DOL distribution only).

**17. Reasons not to display the expiration date for OMB approval.**

The expiration date for OMB approval will be displayed on the website forms.

**18. Exceptions to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-1.**

There are no exceptions to the certification statement.

**B. Statistical Methods**

This collection of information does not employ statistical methodologies.