

## **A. Justification**

### **1. Explain the circumstances that make the collection of information necessary. Include identification of any legal or administrative requirements that necessitate the collection.**

In accordance with Public Law 95-507, an amendment to the Small Business Act and the Small Business Investment Act of 1953, OSDBU is responsible for the implementation and execution of the Department of Transportation (DOT) activities on behalf of small businesses, in accordance with Section 8, 15 and 31 of the Small Business Act (SBA), as amended. The Office of Small and Disadvantaged Business Utilization also administers the provisions of Title 49, of the United States Code, Section 332, the Minority Resource Center (MRC) which includes the duties of advocacy, outreach and financial services on behalf of small and disadvantaged business businesses and those certified under CFR 49 parts 23 and or 26 as Disadvantaged Business Enterprises (DBE).

### **2. Indicate how, by whom, and for what purpose the information is based.**

The Small Business Transportation Resource Regional Centers (SBTRCs) will collect information on Business (WOB), Small Disadvantaged Business (SDB), 8(a), Service-Disabled Veteran-Owned Business (SDVOB), HubZone, and types of services they seek from the SBTRCs. Services and responsibilities of the SBTRCs include business analysis; general management & technical assistance and training; technical assistance referrals; business counseling; outreach services/conference participation; and short-term loan assistance. The cumulative data collected will be analyzed by the OSDBU to determine the effectiveness of services provided, including counseling, outreach, and financial services. Such data will also be analyzed by the OSDBU to determine agency effectiveness in assisting small businesses to enhance their opportunities to participate in government contracts and subcontracts.

### **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.**

The Regional Center Intake Form (DOT F 4500) is used by the Regional SBTRC staff to enroll small business clients into the program in order to create a viable database of firms that can participate in government contracts and subcontracts, especially those projects that are transportation related. In addition, each enrolled small business will be assigned a client number that can track the firm's involvement in the services offered by the SBTRCs. Each area on the form must be filled in electronically by the SBTRCs and retained in secured files of the client.

The Regional Resource Center Monthly Report Form (DOT F 4502)

Each SBTRC must submit a monthly status report of business activities conducted and accomplishments during the previous month. In addition, the form includes a data collection

section where numbers and hours are reported and a section that is assigned for a written narrative that provides back up that supports the numerical data.

Activities to be reported include:

- 1) Counseling Activity - which identifies the counseling hours provided to businesses, number of new appointments, and follow-up with counseled clients.
- 2) Activity for Businesses Served - identifies the type of small business that is helped, such as DBE, 8(a), WOB, HubZone, SDB, SDVOB, or VOSB.
- 3) Marketing Activity - includes the events attended by the SBTRC and the role played when participating in a conference, workshop or any other venue that relates to small businesses.
- 4) Meetings that are held with transportation-related government representatives in the region or at the state level.
- 5) Events Hosted by the SBTRCs, such as small business workshops, financial assistance workshops, matchmaking events.

The collection of such information involves the use of electronic submission by the Regional Centers as a means of reducing costs and increasing efficiency.

The Counseling Information Form

This form has been consolidated with the Regional Resource Center Monthly Report Form (DOT F 4502), and is no longer in use.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose(s) described in Item 2 above.**

The Office of Small and Disadvantaged Business Utilization has a tracking system that is used by the SBTRCs to evaluate the effectiveness of the program in providing assistance to the small businesses in each region. All forms and other data collected by the SBTRCs are completed and submitted to the OSDBU electronically. The availability of our on-line tracking system for collection of information provides the Office of Small and Disadvantaged Business Utilization and the Small Business Transportation Resource Centers with a more accurate and efficient basis for offering improved services to small, disadvantaged business enterprises (DBEs) and women businesses in their efforts to obtain transportation-related government contracts and subcontracts.

**5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize the burden.**

Data collection will not have a significant economic impact on a substantial number of small entities because the Small Business Transportation Resource Centers must complete only one Intake Form for each small business that seeks assistance from the SBTRCs. Each business will have a Client number that indexes their application and avoids the need for the Regional SBTRCs to complete duplicate forms. The OSDBU requests in its renewal that the Counseling Information Form be eliminated and combine categories with The Regional Resource Center Monthly Report Form (DOT F 4502). This will facilitate the collection of data by using a

computerized process to make the completion more efficient and to facilitate the storage and retrieval of the data when required.

**6. Describe the consequence to federal program or policy activities if the collection is not conducted or is conducted less frequently.**

Failure to allow collection of requested data will thwart the efforts of the Small Business Transportation Resource Centers in providing assistance to small businesses in the areas of business analyses, general management & technical assistance and training, business counseling, outreach services, and short term lending to businesses in support of their transportation-related contracts. DOT also works closely with recipients of DOT funds (primarily state and local transportation agencies) to ensure that small businesses and disadvantaged business enterprises (DBEs) have an equitable opportunity to participate in DOT funded contracts and subcontracts. In addition, DOT's Strategic Plan for FYs 2006-2011 describes its new ideas through goals, strategies and the results it will achieve to improve the United States transportation sector. DOT has set policy goals in five strategic areas: Safety, Reduced Congestion, Global Connectivity, Environmental Stewardship, and Security, Preparedness and Response. The SBTRCs, as grantees of OSDBU, are also obliged to adhere to the DOT mission. Also, the OSDBU has an arrangement with the U.S. Small Business Administration under "Reciprocal Procedures for Expediting the Certification Requirements of SBA regulations (13 C.F.R. part 124) and regulations (49 C.F.R. parts 23 and 26)." Said regulations require DOT and SBA to work together to increase the participation of small, women-owned and disadvantaged business enterprises in prime contracting and subcontracting opportunities at DOT.

**7. Explain any special circumstances that required the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.**

These collections are consistent with the guidelines in 5 CFR 1320.6.

**8. 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 and describe actions taken by the agency in response to these comments. 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 and reported.**

A notice (copy attached), pursuant to 5 CFR 1320.8(d), soliciting comments on the proposed approval of the information collection on Thursday, June 26, 2008, [FR Vol. 73, No.124, Page 36368-36370]. **No comments were received as of this time. (Final Review by July 25, 2008)**

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

No payments or gifts are provided to respondents.

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

The Office of Small and Disadvantaged Business Utilization and its Small Business Transportation Resource Centers are required to comply with the Information Privacy Principles (IPPs) in the Privacy Act 1988 when handling personal information. The legislation ensures that contractors and their subcontractors can be held accountable under the Privacy Act for any breaches of privacy obligations that they commit. An individual who considers that a contractor or subcontractor has breached their obligations in the handling of personal information about them can complain to the Commissioner who has jurisdiction to directly investigate the actions of the contractor or subcontractor.

**11. Provide additional information for any questions of a sensitive nature, such as sexual behavior and attitude, religious beliefs, and other matters that are commonly considered private.** This justification should include the reasons why the agency considers the question 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.

There are no questions of a sensitive nature, such as those areas identified above.

**12. Provide estimates of the hour burden of collection of information, including:**

The Regional Center Intake Form (DOT F 4500)  
Estimated Total Burden on Respondents is 600 hours:

The Regional Resource Center Monthly Report Form (DOT F 4502)  
Estimated Total Burden on Respondents is 1200 hours:

The Counseling Information Form has been consolidated with The Regional Resource Center Monthly Report Form (DOT F 4502). The Counseling Information Form is no longer in use.

**Explanation of how the burden was estimated:**

The Regional Center Intake Form (DOT F 4500) takes about 5/10 of an hour to complete multiplied by 100 respondents x 12 months is 600 burden hours (100 Respondents x frequency (12 months) x 5/10 of an hour = 600 hours).

The Regional Resource Center Monthly Report Form (DOT F 4502) takes about 1 hour to complete multiplied by 100 respondents x 12 months is 1200 burden hours. (100 respondents x frequency (12 months) x 1 hour = 1200 hours).

**13. Provide an estimate of the total annual cost burden to respondents or record-keepers resulting from the collection.**

- (a) Total capital/start-up costs: None
- (b) Total operation and maintenance: None

The burden should extend no further than collecting already existing material, and inserting it in a form appropriate for filing with the Department and with OSDBU.

**The annualized cost** is based on the following:

The Regional Center Intake Form (DOT F 4500)

The annualized cost is based on the hourly wage (\$26 .00) for Project Director at a grade (GS/9 Step 5), multiplied by 5/10 of an hour totals \$780.00.

The Regional Resource Center Monthly Report Form (DOT F 4502)

The annualized cost is based on the hourly wage (\$26.00) for Project Director at a grade (GS/9, Step 5), multiplied by 1 hour totals \$1,560.

**14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expense, and any other expense that would not have been incurred without this collection information.**

The Regional Center Intake Form (DOT F 4500)

Estimated annualized cost to DOT of examining forms from 100 respondents, entering the data into the computer, and filing the documents is 600 burden hours. 600 burden hours x \$22.83 (based on the FY 2008 hourly GS9/1 for a Department Analyst), totals \$13,698. The average time required to process information from The Regional Center Intake Form by a Department Analyst is 1/12 of an hour.

The Regional Resource Center Monthly Report Form (DOT F 4502)

Estimated annualized cost to DOT of examining forms from 100 respondents, entering the data into the computer, and filing the documents is 1200 burden hours. 1200 burden hours x \$22.83 (based on the FY 2008 hourly GS9/1 for a Department Analyst), totals \$27,396. The average time required to process information from The Regional Resource Center Monthly Report Form by a Department Analyst is 0.25 hours.

The Counseling Information Form

This form has been consolidated with the Regional Resource Center Monthly Report Form (DOT F 4502), and is no longer in use.

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

The collections of information listed in item 14 constitute a program change. The Counseling Information Form has been consolidated with the Regional Resource Center Monthly Report Form (DOT F 4502), and is no longer in use. The Office of Small and Disadvantaged Business Utilization created such forms due to necessity in accurately evaluating, monitoring and promoting quality general business needs of small businesses.

**16. For collection of information whose results will be published, outline plans for tabulation and publications.**

Not Applicable

**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.**

Not Applicable.

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

Not Applicable.

**B. Collection of Information Employing Statistical Methods.**

Not Applicable.