

PAPERWORK REDUCTION ACT SUBMISSION  
Supporting Statement for Information Collection under OMB Control #3245-0075  
SBA Form 20: Training Program Evaluation

**A. Justification**

1. 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 information requested on Form 20 is needed to plan, monitor and control the Small Business Administration's (SBA) small business management training programs and to provide statistical data to the President and Congress on these programs' focus, emphasis and participation. These training programs are carried out pursuant to cooperative agreements with SBA's resource partners (Small Business Development Centers (SBDCs) and Women's Business Centers (WBCs)) under authority of sections 21(a) and 29(b) of the Small Business Act (15 U.S.C. 648(a) and 656(b) respectively). These resource partners provide education, training and counseling to current and prospective small business owners at over 1,500 locations across the country and U.S. territories. Some of the training programs offered include: Writing an Effective Business Plan; Small Business Marketing Strategies; Winning Strategies for Minority Entrepreneurs; and Legal Issues of the Small Business.

2. 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 resource partners nation-wide conduct training sessions and workshops for new, existing and potential small business owners. At these training sessions, Form 20 is disseminated to all class participants to complete. The Forms are then collected by the resource partners and analyzed to determine whether the training sessions are meeting the needs of the business community. The information provided allows the resource partners to focus on special interest of the groups, emphasize special training needs and enhance their training programs. Collecting the information also serves as accountability of class participation and validation of accounting records. The resource partners submit an annual report to the SBA, including information on training events, such as issues addressed, number of attendees, locations, highlights, etc. SBA uses the information to assess whether resource partners are delivering training and counseling services as required, the comprehensiveness and relevance of these services, and the extent to which the services are effectively serving their purpose.

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, 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 burden.

These forms are completed manually and primarily collected at the end of the course from the participant. If this information is not collected promptly at the end of the course, the information

provided by the class participant may or may not be as accurate as possible. However, the participants are given the option of faxing the form to the resource partner within a prescribed time period, which should be shortly after the end of the training program. This form is currently available on SBA's website at

[http://www.sba.gov/idc/groups/public/documents/sba\\_homepage/forms\\_trng20.pdf](http://www.sba.gov/idc/groups/public/documents/sba_homepage/forms_trng20.pdf)

4. 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.

Form 20 collects training information that is unique to each training session and to each small business owner or nascent owner in attendance at the sessions. To the extent that a respondent may attend more than one training session, there is the possibility of minor duplicative information. However, because the responses are anonymous, there is no way to make that determination.

5. 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.

This information collection has minimal burden on the program participants (small business owners or nascent owners). It takes approximately 12 minutes to complete and does not require respondents to consult with extrinsic sources in order to respond. Internal testing confirmed that the form uses plain English and unambiguous terminology that is understandable to the training participants who will be asked to complete it.

6. Describe the consequence to 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 reduce burden.

Without this information collection effort, the resource partners would not be able to obtain the information needed to support the requirement of meeting the small business community training needs and would not have a simple non-invasive means to receive feedback from their clients. Further, if the information is not collected SBA's ability to evaluate its various award programs would be greatly impaired.

7. Explain any special circumstances. Explain any special circumstances that would cause an information collection to be conducted in a manner etc.

There are no special circumstances which require the collection of information in a manner inconsistent with the guidelines as stated on OMB Form 83-I.

8. Federal Register Notice. 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 public comments received. 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, or reported.

Comments from the general public were requested in a February 8, 2010, Federal Register notice published in 75 Federal Register 6226. No comments were received. SBA consulted with its resource partners in the various programs in determining realistic burden estimates.

9. Payment or Gift to Respondents. Explain any decision to provide any payment or gif to respondents, other than remuneration of contractors or grantees.

SBA will not provide any payments or gifts to respondents during this information collection, other than remuneration of contractors or grantees in accordance with the terms of the award.

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

None provided.

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

The small business community is comprised of a broad spectrum of individuals. To better serve these varied communities, the trainer uses the form as a measurement to ascertain the general composition of his/her particular small business communities. By using the general categories of race, gender, disability status, education and age, this will enable him/her to analyze and distinguish specific business difficulties among the various stated groups. However, the information is collected anonymously so any information collected that could in other circumstances be deemed sensitive or confidential cannot be linked to any individual.

12. Estimates of Hourly and Cost Burden

The estimated average burden to respondents is a total of 40,000 hours. This is based on an estimated 200,000 annual respondents taking 12 minutes apiece on average to complete a survey. Evaluated at \$30.00 an hours, the annualized cost to respondents is \$240,000.

Annual number of respondents:	200,000
Frequency of response per year	1
instrument completion time (based on survey)	12 minutes
Total annual hour burden for all respondents	40,000 hours
Average hourly wage of respondents	\$30.00
(based on informal survey of resource partners)	
Average cost to complete	\$6.00
Total annualized cost to respondents	\$240,000

13. Start up or Capital costs. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information. Do not include hour cost burden from above.

The proposed information collection required no capital equipment purchasing concerning systems and technology, nor any other purchases on the part of the respondents. There is thus no associated capital or start-up cost.

14. Costs to the Federal Government. Provide estimates of annualized costs to the Federal Government. Also provide a description of the method used to estimate cost, including a 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.

SBA estimates that General Schedules (GS-12/13) SBA Project Officers devote a total of approximately 116 hours per year (about two hours per project officer) to review and, analyze the form, which is part of their on site review duties. The total cost of \$4,640 is the estimated cost to the Federal Government. Our average hourly rate of \$40 includes all operational expenses associated with the collection of this information

Total hours	116
Hourly cost	\$40
Number of SBDCs	58
Frequency of Response	1

Total Federal Cost Burden 116 hours/per year x \$35 (GS-12 or 13 hourly rate) = \$4,640

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

There are no program changes or adjustments.

16. Publication of Information Collection. For collection of information whose results will be published, outline plans for tabulation and publication. Address complex analytical techniques. .

Data will be used for internal reports and will not be published.

17. Expiration Date. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why the display would be inappropriate.

The Agency is not seeking approval to not display the expiration date for OMB approval of this collection.

18. Exception to the Certification. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submission" of OMB Form 83-I

This collection requires no exceptions to the certification statement identified in Item 19 of OMB Form 83-1.

B. Collection of Information Employing Statistical Methods. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used.

Not applicable.