

To: Wendy Liberante, Policy Analyst, Office of Management and Budget

From: Holly Schick, Deputy Associate Administrator
Office of Entrepreneurial Development

RE: Request for Emergency Approval of changes to data collection form to
comply with the Small Business Jobs Act (SBJA) of 2010

ATTACH: Comparison of timelines for Emergency vs. Normal Process

DATE: January 18, 2011

Background:

The SBJA requires SBA to begin submitting annual reports to Congress that contain detailed outcome summaries of our international trade assistance efforts to small business concerns.

The 641 form has been the primary data collection tool for SBA's resource partner programs (SBDCs, SCORE, and WBCs) for the last 6 years. In November of 2010, the form was approved by OMB until November 2013. This approval was prepared and submitted using the normal process and was submitted prior to the passage of the SBJA.

The changes, for which we now seek this emergency approval, are necessary in order to comply with data requirements specified by the Small Business Jobs Act 2010 for international trade assistance efforts.

Justification:

The Small Business Jobs Act 2010 specifically requires the new Office of International Trade to submit annual reports to Congress. The first will be submitted during the first quarter of FY2012, covering the performance period of FY2011.

The Office of Entrepreneurial Development (OED) needs quickly deploy this updated form to its national network in order to have data available for this first annual report.

As outlined in 5 CFR§ 1320.13 Emergency processing, this request meets the emergency requirements in the following:

(1) The collection of information:

- (i) *Is needed prior to the expiration of time periods established under this Part.*
The regular approval process will not allow enough time for OED to deploy the data collection changes and begin collecting data in time to submit data in this first annual report to Congress.

The attached chart illustrates the time required to complete the full approval process, compared to the emergency approval process. Please note SBA has an agreement with the agency's resource partners to provide 90 advance notice regarding changes to the agency's data collection system and requirements. Both projected timelines include this agreement.

- (ii) *Is essential to the mission of the Agency.*

It is mission critical that the Agency demonstrate its full support of the President's Export Initiative. A key component of that mission will be to have a comprehensive first annual report to submit to Congress, in which OED's resource partners can have at least 4-5 months of data and analysis to include. Without this, the Agency's largest non-credit program will not be represented in this first annual report.

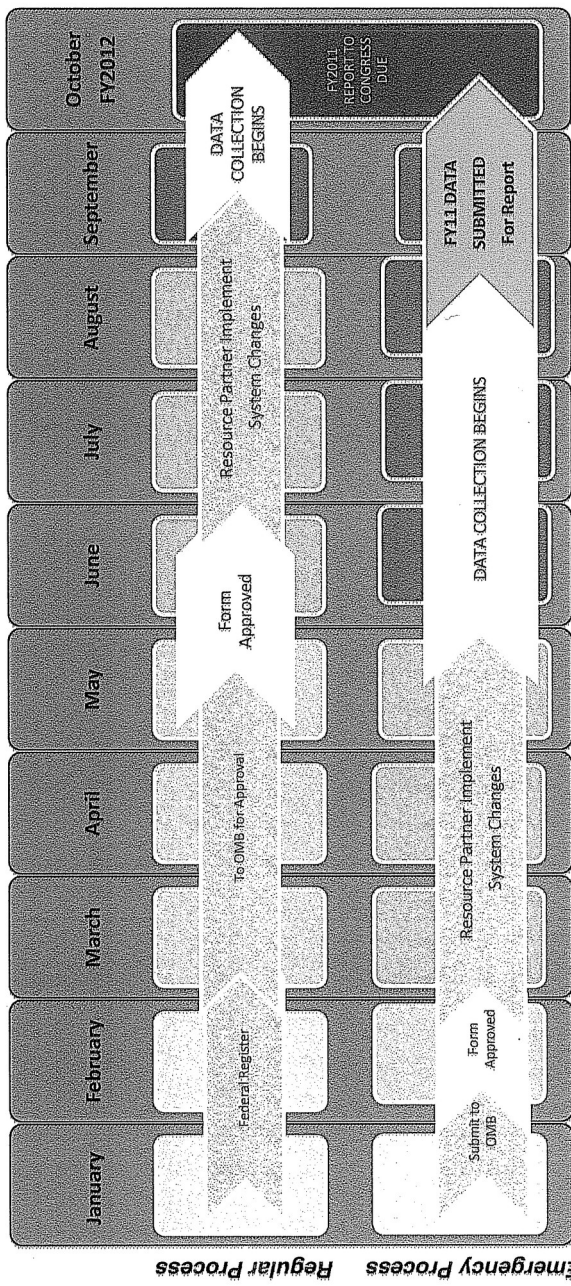
(2) The Agency cannot reasonably comply with the normal clearance procedures under this Part because:

- (iii) *The use of normal clearance procedures is reasonably likely to prevent or disrupt the collection of information.*

We will miss the first annual report deadline for submitting data from our resource partners network, if the normal process is utilized. OED's resource partners counsel small businesses in the opportunities for business growth through international trade (IT), help them develop an IT business plan, locate financing resources, link them to Department of Commerce/USEAC resources and SBA's Office of International Trade. All of these activities will be absent in the FY2011 report, as the normal process will not allow us to deploy the new form, make the software changes and begin collecting data that can be included in this report.

Thank you for your consideration.

Timeline for 641 Form Approval



No data for FY11 Report

4 months of data for FY11 Report

Regular Approval: 60 day Federal Register Notice + 60 day OMB Approval + 90 day Resource Partner System Changes = 210 Days

Emergency Approval: 10 day OMB Approval + 90 day Resource Partner System Changes = 100 Days