

## **Supporting Statement for 2105-0554 (OSDBU)**

### **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 (P.L. 95-507), an amendment to Small Business Act and Small Business Investment Act of 1953, the Department of Transportation's (DOT) Office of Small and Disadvantaged Utilization (OSDBU) is responsible for the implementation and execution of 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 businesses and those certified under CFR 49 parts 23 and or 26 as Disadvantaged Business Enterprises (DBE). The cumulative data collected will be analyzed by the OSDBU to determine the effectiveness in assisting small businesses to enhance their opportunities to participate in DOT contracts and subcontracts.

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

SBTRC's Regional Field Offices will collect information on DOT forms 4500 and 4502 on small businesses, which includes Disadvantaged Business Enterprise (DBE), Women-Owned Small Business (WOB), Small Disadvantaged Business (SDB), 8(a), Service Disabled Veteran Owned Business (SDVOB), Veteran Owned Small Business (VOSB), HubZone, and types of services they seek from the Regional Field Offices. Services and responsibilities of the Field Offices include areas such as; business analysis, general management & technical assistance, training, business counseling, outreach services/conference participation, short-term lending. Also, businesses are able to participate in the Bonding Education Program. The cumulative data collected will be analyzed by the OSDBU to determine the effectiveness of services provided. 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 Field Offices Intake Form, (DOT F 4500) is used 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. Each area on the fillable pdf form must be filled in electronically by the Field Offices and submitted every quarter to OSDBU. The collection of such information involves the use of electronic submission by the Regional Centers as a means of reducing costs and increasing efficiency. 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.

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**The Regional Field Offices Quarterly Report Form (DOT F 4502)** must be submitted by each Office as a quarterly status report of business activities conducted during a three month time frame. The form is used to capture activities and accomplishments that were made by the Regional Field Offices during the course of the quarter. 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 which supports the data. Activities to be reported include areas such as:

- 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 and 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.

#### **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 reporting system that is unique to DOT for evaluating the effectiveness of the program in providing assistance to the small businesses in each region. Information is collected and transmitted to OSDBU electronically on a quarterly basis or on an as-needed basis for quick decision making. Our on-line reporting system enhances the information collection process and provides OSDBU with a more accurate and efficient basis for offering improved services to small, women-owned and DBE firms 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.**

Collection of information will not have a significant economic impact on a substantial number of small entities because the Regional Field Offices must complete only one Intake Form (DOT F 4500) per each small business person who seeks assistance from the Field Office. Each company will have a Client number that indexes their application and avoids the need to create duplicate Intake Forms. In addition, there is a report due each quarter (a total of 4 per year) from the Field Office which highlights the services provided to small businesses enrolled in the program. All transactions are converted to fillable pdf forms to facilitate the storage and retrieval of information as required.

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**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 would thwart the efforts of the Office of Small and Disadvantaged Business Utilization in providing assistance to small businesses that are in need of services such as outreach marketing, training and technical assistance and financial assistance. OSDBU works closely with recipients of DOT funds (primarily state DOTs, Transit Authorities, Rail, and Airports) to ensure that small businesses have an equitable opportunity to participate in DOT funded contracts and subcontracts. If OSDBU is denied this requested information, the agency may breach its duty owed to Small Business Administration under "Reciprocal Procedures for Expediting the Certification Requirements of SBA regulations (13 C.F.R. part 124) and DOT regulations (49 C.F.R. parts 23 and 26). The SBA regulations created opportunities for converting the forms to a computerized form to make their completion and revision more efficient and to facilitate the storage and retrieval of the data they contain. This would increase the participation of small, women-owned and DBEs 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 Tuesday, January 31, 2012, [FR Vol. 77, No. 20, Page 4862-4863]. **No comments were received.**

**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 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

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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:**

There are two forms associated with this collection, *SBTRC Regional Field Offices Intake Form* (DOT F 4500) and *SBTRC Regional Field Offices Quarterly Report Form* (DOT F 4502). Resulting from use of these two forms the total burden for this information collection is **1800 hours**.

Number of annual respondents:

- SBTRC Regional Field Offices Intake Form (DOT F 4500)  
Estimated total Annual Burden on Respondents: **600 hours per year**
- SBTRC Regional Field Offices Quarterly Report Form (DOT F 4502)  
Estimated total annual Burden on Respondents: **1200 hours per year**

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

SBTRC Regional Field Offices Intake Form (DOT F 4500)

*Estimated Total Annual Burden on Respondents:* 600 hours per year:

- 600 hours per year divided by 100 responses = 6 hours per year
- 100 responses divided by 6 hours per year = approximately 1.6 hours, or 90 minutes to complete each Intake Form

(This formula is an update to the calculations that were advertised in the 60 Day Notice; Federal Register/Vol.77, No. 20/Tuesday, January 31, 2012/Notices)

SBTRC Regional Field Offices Quarterly Report Form (DOT F 4502)

*Estimated Total Annual Burden on Respondents:* 1200 hours per year:

- 1200 hours per year divided by 100 responses = 12 hours per response
- 12 hours per year divided by 4 quarters per year = 3 hours per quarter
- Total estimated hours = 3 hours per quarter for each form

(This formula is an update to the calculations that were advertised in the 60 Day Notice; Federal Register/Vol.77, No. 20/Tuesday, January 31, 2012/Notices)

**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

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(b) Total operation and maintenance: None

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

**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 cost for 176 hours of a GS-13 Federal Employee is \$ 7,758.

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

DOT Small Business Transportation Resource Centers located in field offices within various states assist small businesses to complete the applicant intake form (DOT F4500), which consist of information for accounting, planning, contract review, marketing, and bidding estimates to name a few. This outreach service is provided to assist small businesses in getting transportation related contracts.

The Regional Resource Center Quarterly Report Form (DOT F4502) was changed from an earlier form called the Monthly Report Form (DOT F4502). The reasons for changing from a monthly to quarterly reporting was to gather more information with less burden on the respondents, to develop a more comprehensive report. This saves time and burden for small businesses as Regional Field Offices compile the quarterly report (DOT F4502) four times a year, versus 12 times a year.

**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.**

Expiration dates should be displayed.

**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.