

Supporting Statement for Paperwork Reduction Act Submission
OMB Control Number 3245-0136
SBA Form 987, Disaster Survey Worksheet

The purpose of this submission is to request OMB reauthorization of the SBA Form 987, "Disaster Survey Worksheet."

The SBA Form 987 has not been revised except for minimal format changes.

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 Small Business Administration (SBA) is authorized to make loans to victims of disasters for the purpose of restoring their damaged property to, as near as possible, pre-disaster conditions. SBA also has authority to offer loans to small businesses to help them recover from economic injury caused by a disaster. See 15 U.S.C. 636 (b) and implementing regulations at 13 CFR 123. (Copies of the pertinent provisions are attached.) A disaster declaration, which can be issued by either the President or the SBA Administrator, is a prerequisite to the availability of any disaster loan assistance. The minimum criteria for declarations by the SBA's Administrator are listed in 13 CFR 123.3. For physical disaster declarations in particular, SBA personnel must make certain threshold determinations, as described in section 123.3 (a) (3), regarding the amount of damage in an affected area. The information collected on this form facilitates that process.

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.*

13 CFR 123.3 establishes the minimum criteria necessary for the Agency to declare a physical disaster. SBA Form 987 is used by SBA's Office of Disaster Assistance (ODA) staff to record information regarding disaster damage. The information is gathered by questioning affected individuals about the extent of their damage and potential insurance recovery for Presidential and Agency declarations. State and local officials are also questioned to obtain information helpful for the decision process. With this information, ODA determines if sufficient damage has occurred to warrant a disaster declaration by the Administrator of SBA.

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 the burden.

Although information is collected from the public, the SBA 987 is not filled out by the public. ODA representatives collect the information from public and State government officials in person after a disaster has occurred. The information is used to complete the form. ODA representatives who use electronic mobile devices collect information contained on the SBA 987. The data is temporarily stored on the remote devices and then transferred to a core database at a secure location through secure connections within the Disaster Credit Management System (DCMS). DCMS is a web-based system that supports all ODA loan-processing activities, including the disaster management, loss verification, legal, document management, and portfolio maintenance tasks.

- 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.*

SBA collaborates and consults other Federal Agencies to ensure duplicate information is not collected. Information is not available before the disaster occurs. SBA does not collect this information through any other means.

- 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.*

Small businesses or small entities comprise a portion of the respondent sample. There is no significant economic impact on them. In any event, where possible, a visual inspection is made to obtain the information needed to complete the survey without the need to question the affected party. When this is not possible, questions are limited to very general information about damage sustained and insurance coverage in effect.

- 6. Describe the consequence to the 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 reducing burden.*

The Disaster Survey Worksheet is completed in support of the State's request for a disaster declaration. SBA is part of the survey whether a request is for a Presidential declaration or directly to SBA for an Agency declaration. When the request is for a Presidential declaration, SBA is included in the survey teams under the direction of FEMA. SBA completes the worksheet to establish eligibility for the Agency declaration if the request for a Presidential declaration is declined.

If this information were not collected, ODA could not process disaster declaration requests because there would be no basis upon which to determine if sufficient damage has occurred to warrant a disaster declaration by the Administrator of SBA. Since this information is collected only after a written request for a disaster declaration is made by the Governor or Governor's authorized representative of the affected state, it cannot be

collected less frequently.

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

There are no special circumstances.

8. *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.*

ODA solicited comments in Federal Register, 77 FR 43 43411, dated July 24, 2012 (copy attached). The comment period closed September 24, 2012, and no comments were received.

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

There are no payments or gifts to respondents.

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

The information is not specifically linked to any person or entity nor is it retrieved by a personal identifier. Therefore, there is no need for assurances of confidentiality. The information is however, subject to disclosure under the Freedom of Information Act (5 U.S.C. §552).

11. *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, specific uses to be made of the information, explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.*

No sensitive questions are asked.

12. *Provide estimates of the hour burden of the collection of information, well as the hour cost burden. Indicate the number of respondents, frequency of response, annual hour and cost burden, and an explanation of how the burden was estimated.*

We estimate that an average of 40 individuals and businesses (respondents) are queried regarding damage to their property per survey. This is the average number of queries needed to adequately determine whether the minimum qualifying criteria has been met

(or not met). It takes an estimated 5 minutes per response, which is based on the actual experience of employees in the field who ask these questions.

The hour burden is based on survey activity for the 3 most recent fiscal years (FY 09, 10, and 11). The final data for FY 12 is not yet available. Requests for Presidential and SBA Administrative declarations (both declined and approved) are calculated as these are the declaration types that require surveys. In the breakdown below, declines are listed separately because we track them separately; however, they are essentially either Presidential or Administrative declaration requests that were declined rather than approved, based on the criteria not being met.

<u>FY</u>	<u>Presidential Declarations</u>	<u>SBA Administrative Declarations</u>	<u>Presidential & Administrative Declines</u>	<u>Total Surveys</u>
09	25	40	0	65
10	17	51	3	71
11	36	60	0	96

Total surveys past 3 FYs = 232 divided by 3 = 77 average surveys per year
 77 surveys x 40 respondents per survey = 3,080 responses
 3,080 responses x .083 (5 minutes) per response = **256 hours**

There are minimal financial costs to respondents. The cost estimate for a respondent is based on a GS-5, Step 1 (\$16.33 per hour), which is the level of expertise (minimal) that is required to respond to simple questions. The annual cost is calculated below:

256 hours x \$16.33 per hour = **\$4,181 annual cost to respondents**

13. *Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. Do not include hour cost burden from above. There are no additional costs beyond that identified in Item 12 above.*
14. *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.*

We estimate that it takes approximately 10 hours to survey all respondents per disaster declaration request. This information is based on actual experience. Agency burden hours are calculated below:

77 surveys x 10 hours per survey = **770 Agency burden hours**

The annual cost estimate for the Agency is based on the salary of a GS-11, Step 1, (\$29.93 per hour), which is the typical grade for an employee performing these surveys. The cost is calculated as follows:

770 total hours x \$29.93 per hour = **\$23,046 Cost to the Government**

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

The public burden decreased slightly due to a small decrease in the number of surveys conducted during the most recent three fiscal years.

16. *For collection of information whose results will be published, outline plans for tabulation and publication. Address complex analytical techniques. Provide time schedules for the entire project.*

No publication is anticipated.

17. *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.*

ODA will display the expiration date.

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

There are no exceptions to the certification statement.

- B. Collections of Information Employing Statistical Methods.

N/A