

Department of the Treasury, Office of Inspector General
Supporting Statement and Request for Clearance
State Small Business Credit Initiative (SSBCI) – ‘Effectiveness of the State Small Business
Credit Initiative’

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 Office of Small Business Lending Fund (SBLF) Program Oversight within Treasury Office of Inspector General (OIG) was created through § 3011 of the Small Business Jobs Act of 2010, Public Law 111-240. A Special Deputy Inspector General for SBLF Program Oversight is responsible for audit and investigations related to the SSBCI program; and must report to the Secretary of the Treasury and Congress on the results of oversight activities, including recommended program improvements. In addition to the above survey, Treasury OIG seeks to survey SSBCI recipients on what specific factors contributed to their use of the SSBCI funds.

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.

This is a new information collection. All current SSBCI participants (57) will be surveyed to obtain their viewpoints of the SSBCI program, its administration, and their use of the SSBCI funds. This is necessary for us to carry out the oversight responsibilities assigned to us by the Act.

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.

Survey responses will be submitted through email using a fillable PDF form. This means of collection was chosen to reduce the respondents’ burden in completing the survey.

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.

Treasury OIG sought this information and could not find it available from any sources. This OIG survey seeks only information that is not publicly available, has not been previously

provided to Treasury, and can only be obtained through individual responses from the SSBCI participants.

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.

The participants range in size from municipalities to states. The survey will take about 1.5 hours to complete. The information requested is readily available to the participants and consists mainly of officials' opinions and viewpoints, estimation, and some data collection.

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 reducing burden.

If the information is not collected, Treasury OIG will not be able to determine what factors affected SSBCI participants' use of the SSBCI funds, what factors influence which programs the participants use SSBCI funds for, and the viewpoint of participants on the administration of the SSBCI program by Treasury, and will be hindered in its efforts to carry out the oversight responsibility assigned to us by the Act.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with OMB guidelines.

OIG's information collection will be conducted in a manner consistent with OMB guidelines.

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 in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. 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.

We did not solicit comments on this information collection because we are requesting an expedited clearance for three reasons. First, under § 3011 of the Act, the Special Deputy Inspector General for SBLF Program Oversight is responsible for audit and investigations related to the SSBCI program and must report to the Secretary of the Treasury and Congress on the results of oversight activities, including recommended program improvements. We are concerned about meeting this requirement timely for 2013, and therefore request to expedite the clearance process for this information collection. Secondly, this information collection primarily requests respondent's opinions and viewpoints and has a relatively modest time burden of an

estimated 1.5 hours. We pre-tested it with eight SSBCI participants. Based on comments from the SSBCI participants in these pretests, we made appropriate revisions to the survey. All of the pretest participants were able to complete the survey in less than 1.5 hours.

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

Respondents will not be offered payments or gifts.

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

In the Freedom of Information Act section of the instructions for the survey, respondents are provided with the following information:

Respondents are notified that this survey, as a record of the Office of the Special Deputy IG for SBLF Program Oversight, may be subject to requests for disclosure made under the Freedom of Information Act, 5 U.S.C. Section 552. It is the policy of the United States Government and this office to make public records available unless a disclosure exemption incorporated in the FOIA is specifically applicable. Information provided in this survey that qualifies as proprietary information under Exemption 4, 5 U.S.C. Section 552(b)(4), will not be released in response to a FOIA request or otherwise be made available without consultation with the information provider. For further information, contact the Office of Counsel, Treasury Office of Inspector General, 740 15th Street NW, Washington, DC 20220, 202-927-0650, OIGCounsel@oig.treas.gov.

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, 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.

This questionnaire will not ask any questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information.

The information collection imposes a minimal burden, because the information requested is readily available to the institutions. Treasury OIG estimates that the survey will take approximately 1.5 hours to complete (12 questions requiring respondents to check an answer at 2-3 minutes each and 9 fill-in areas at 5-6 minutes each). We pretested with eight participants, and on average, the pretest institutions completed the questionnaire in less than 1.5 hours.

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

Treasury OIG estimates that there will be no annualized costs for the respondents to collect and submit this information because this is a one-time questionnaire, and the burden to answer the questionnaire is listed in Item 12.

14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include 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. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

Treasury OIG estimates that there will be no annualized costs for the Federal government to collect this information because the effort is a one-time questionnaire.

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

Not applicable. OIG will not make any program changes or adjustments.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

After receiving OMB approval, we will contact the participants and alert them to the survey. We will then issue the survey and give the SSBCI participants 7 to 10 business days to complete it. We will review the participant responses and contact any respondents that did not answer the survey, provided an incomplete survey, or provided unclear or internally inconsistent answers. Once survey results have been validated, we will work with our statistical expert on calculating response rates where appropriate. Our performance auditors and analysts will summarize the results into an audit report. Treasury OIG plans to publish a report based on this survey before the end of fiscal year 2013.

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.

Treasury OIG will display the expiration date of the information collection.

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

There are no exceptions to the certification statement in item 19 of Form 83-I.