

Department of the Treasury, Departmental Offices
Supporting Statement and Request for Clearance
Small Business Lending Fund – Small Business Lending Survey

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.

Established by the Small Business Jobs Act of 2010 (the Act)(Public Law 111-240), the Small Business Lending Fund (SBLF) is a dedicated fund designed to provide capital to qualified community banks and community development loan funds (CDLFs) in order to encourage small business lending. The purpose of the SBLF is to encourage Main Street banks and small businesses to work together, help create jobs, and promote economic growth in communities across the nation. In order to receive capital from the SBLF, institutions were required to enter into a Securities Purchase Agreement with Treasury. Under Section 3.1(c)(ii)(D) of the Securities Purchase Agreement, institutions participating in the SBLF are required to complete an annual survey providing a description of, among other things, how the institutions have utilized the SBLF funds and how the funds have impacted the operations and status of the institutions. As such, Treasury is seeking responses from institutions participating in the SBLF regarding the institutions' small business lending policies and practices, use of SBLF funding, and efforts to engage in outreach activities with respect to small business lending.

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.

All SBLF participants are required to complete the survey under Section 3.1(c)(ii)(D) of the Securities Purchase Agreement they entered into with Treasury. The information provided in the SBLF participants' survey responses is used to gauge how they are using SBLF capital and the results are published on Treasury's website.

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.

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.

The information that will be collected in the SBLF Lending Survey is an annual request. This survey will include questions on SBLF participants' small business lending policies and practices, use of SBLF funding, and efforts to engage in outreach activities with respect to small business lending. While Treasury has a statutory requirement to submit a quarterly SBLF Use of Funds Report to Congress, the information collected from participants for that report is by and large not duplicated in the survey. For the most part, the survey will request information that is not publicly available, has not been previously provided to Treasury, and can only be obtained through individual responses from the SBLF 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.

Though some of the participating institutions are small entities, all participants are required to complete the annual survey as part of the Securities Purchase Agreement they signed when they received SBLF funding. This information collection will not have a significant economic impact on these small entities. The information collection imposes only minimal burdens, because the information requested is readily available to the institutions.

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 will not be able to determine how individual SBLF participants utilized SBLF funds, and will be more limited in its ability to report on the performance of the SBLF program.

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

Not applicable.

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.

A notice soliciting public comments was published in the Federal Register on May 12, 2014, at 79 FR 27048 and no comments were received. The SBLF consulted with Deputy Assistant Secretary for Microeconomic Analysis Alexander Gelber (202-622-1513) on the design of the survey. In addition, the SBLF conferred with Bill Bassett at the Board of Governors of the Federal Reserve System to discuss similarities between the SBLF lending survey and the Federal Reserve's Senior Loan Officer Opinion Survey.

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

Not applicable.

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:

Please note that any information submitted by applicants may become subject to public disclosure pursuant to the terms of the Freedom of Information Act, 5 U.S.C. 552 (FOIA) and its exemptions. Nevertheless, Treasury's FOIA regulation, 31 C.F.R. 1.1 et seq., provides that, in certain cases, businesses that submit information to Treasury shall receive notice of a pending FOIA request for that information, as well as an opportunity to object to the disclosure of any or all of that information on the grounds that the information either qualifies for withholding under FOIA Exemption 4. See 31 C.F.R. 1.6.

To facilitate this business submitter notification process, Treasury encourages respondents to designate any such information that they believe, in good faith, is subject to FOIA Exemption 4. Such designations will help Treasury to recognize instances in which business submitter notification may be appropriate. Treasury reserves sole discretion to determine whether such designated information indeed qualifies for business submitter notification and, ultimately, whether it qualifies for withholding pursuant to FOIA Exemption 4. If you wish to identify any information in this survey that you believe is subject to FOIA Exemption 4, please identify that information and the reasons for your request on attached pages.

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.

No personally identifiable information is collected.

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

Treasury estimates that the survey will take approximately 8 hours to complete, and that approximately 278 institutions will respond to the survey. The total estimated annual burden for the collection is 278 institutions x 8 hours = 2,224 hours.

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

Treasury estimates that there will be no annualized capital/start-up costs for the respondents to collect and submit this information. In addition, the information collection imposes only minimal burdens, because the information requested is readily available to the institutions.

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 estimates that there will be no annualized capital/start-up costs for the government to receive this information.

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

This is a reinstatement with change. The only change from the previous submission is an adjustment to the respondent population down to 278, adjusting the estimated annual hours to 2,224.

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.

Survey responses will be due to Treasury by [30 days after receipt]. Treasury plans to publish a report including basic tabulations of the responses in June, 2015.

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 does not object to displaying 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.

Regarding this request for OMB approval, there are no exceptions to the certification statement in item 19 of Form 83-I.