

## Supporting Statement for Paperwork Reduction Act Submission

### Small Business Administration Boots to Business Post Course Surveys

#### A: JUSTIFICATION

##### 1. Circumstances necessitating the collection of information

*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, Office of Veterans Business Development (OVBD) is authorized to formulate, execute and promote policies and programs of the Administration that provide assistance to small business concerns owned and controlled by veterans and small business concerns owned and controlled by service disabled veterans per section 32 of the Small Business Act.

The Secretary of Labor, in conjunction with the Secretary of Defense, the Secretary of Homeland Security, and the Secretary of Veterans Affairs is required by 10 U.S.C. § 1144 (b) (5) to establish and maintain a program to “provide information and other assistance to separating military service members in their efforts to obtain loans and grants from the Small Business Administration and other Federal, State, and local agencies.” The Secretary of Defense is also required by 10 U.S.C. § 1142 (b) (13) to provide to such service members “information concerning veterans small business ownership and entrepreneurship programs of the Small Business Administration.” In addition, in 2011 Congress passed the “VOW to Hire Heroes Act of 2011, Pub. L. 112-56 Title II, §§ 201-265, 125 Stat. 711, 713, which included steps to improve the existing Transition Assistance Program (renamed Transition GPS) for Service Members. Among other things, the VOW Act made participation in several components of Transition GPS mandatory for all service members.

Boots to Business is an entrepreneurial education initiative offered by the U.S. Small Business Administration (SBA) as a career track within the Department of Defense’s revised Transition GPS to comply with these statutory requirements. It is one of three optional training tracks within Transition GPS. The Boots to Business curriculum provides valuable assistance to the transitioning service members exploring self-employment opportunities by leading them through the key steps for evaluating business concepts and the foundational knowledge required for developing a business plan. Participants are also introduced to SBA resources available to help access startup capital and additional technical assistance.

Within the Boots to Business purview, transitioning service members and their spouses may select the Entrepreneurship Career track two day workshop and the Foundations of Entrepreneurship eight week online course upon completion of the workshop. Veterans who have already transitioned may attend the Boots to Business Reboot two day work shop which covers the same material as the traditional Boots to Business course.

2. How, by whom, and for what purpose information will be used

*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.*

These online post course surveys will be deployed to all Boots to Business participants via email upon course completion. This voluntary collection enables the program office to assess both the quality of the courses and the outcomes achieved by participants after attending Boots to Business. The data will be used for overall program management, continuous improvement initiatives and reporting outcomes in order to better serve veteran entrepreneurs. Information used for reporting will be done in the aggregate and will not include Personally Identifiable Information (PII).

3. Technological collection techniques

*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.*

The post course surveys are an online, web based form, permitting electronic responses, ultimately lessening the burden on respondents. Respondents will receive a link to the surveys via email.

4. Avoidance of Duplication

*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.*

Currently, Boots to Business participants are surveyed via a hardcopy DOD Transition Assistance Program class evaluation. Data is provided to SBA on a quarterly basis but does not focus on Boots to Business and does not capture the data needed to report effectively on the program. OVBD receives this data because the Boots to Business “Introduction to Entrepreneurship” course is an elective track available to transitioning service members within the DOD Transition Assistance Program. In order to avoid duplication, the TAP survey data will be used in conjunction with the data collected from the post course surveys to further confirm findings related to the quality of Boots to Business. The post course surveys avoid requesting the same information as the DOD Transition Assistance Program class evaluation.

5. Impact on small businesses or other small entities

*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 Quality Assessment survey will be deployed immediately after the class has occurred so the majority of the respondent population will be transitioning service members and spouses. The Outcome Assessment survey will be deployed every 6 months for 3 years in which case the

respondent population will be veterans who may be small business owners. There is little to no economic impact on small businesses.

6. Consequences if collection of information is not conducted

*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 Office of Veterans Business Development is required to report outcomes of the program and the post course surveys will provide valuable data that will help satisfy this requirement. If this collection is not conducted, there is no way for SBA's program to understand what happens to the participants once they complete the course and whether or not they go on to create businesses which, ultimately, is SBA's goal. Initially the surveys will be conducted every 6 months for 3 years but this is subject to change to a less frequent model as SBA collects data to determine approximately how long it takes to start a business after attending Boots to Business.

7. Existence of special circumstances

*Explain any special circumstances that would cause an information collection to be conducted in a manner:*

- *requiring respondents to report information to the agency more often than quarterly;*
- *requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;*
- *requiring respondents to submit more than an original and two copies of any document;*
- *requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years;*
- *in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;*
- *requiring the use of a statistical data classification that has not been approved by OMB;*
- *that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use;*
- *requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.*

There are no special circumstances.

8. Solicitation of Public Comment

*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 comments received. Describe efforts to consult with persons outside the agency to obtain their views...*

To obtain views of persons outside the agency, a 60-day Federal Register Notice was published on July 9, 2015 at 80 FR 39479. The comment period ended on September 8, 2015. No comments were received.

**9. Payment of gifts**

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

None.

**10. Assurance of Confidentiality**

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

At the beginning of each survey, respondents are asked to permit SBA to use their name and contact information for SBA surveys and information mailings as part of the Boots to Business alumni network. In addition, the Use of Information paragraph at the front of the form outlines the purpose of the surveys, why SBA needs the information and how the information is collected under SBA SOR 5- "Business and Entrepreneurial Initiatives for Small Businesses" and protected to the extent permitted by law including the Privacy Act of 1974, as amended (5 U.S.C. 552a and the Freedom of Information Act (5 U.S.C. 552).

**11. Questions of a sensitive nature**

*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.*

Information such as race, ethnicity, transition type, years of service and age range are requested only on the Outcome Assessment survey so we may identify trends among those veterans who successfully started a business after completing a Boots to Business course. In addition, business information such as financing obtained, number of employees, legal entity and official designations (i.e. HUB-Zone) is requested to further understand where veterans are finding success. All requests for information on the surveys are voluntary.

**12. Estimate the hourly burden of the collection of information**

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

Based on past experience with this course, approximately 15,000 annual respondents are expected. The annual hour burden is determined to be 2,000 hours. The estimate is based upon

a consultation with 7 potential respondents who sampled the draft surveys, averaging 4 minutes for completion per survey for a total annual burden of 8 minutes. At most, a respondent will complete two surveys per year. 15,000 respondents will spend 8 minutes completing the surveys per year.

The average total annual cost burden to the expected number of respondents is \$40,088.64 based on the expected value of participant pay grades. The estimate is based on the average monthly salary (pay grade) of transitioning service members according to DOD and the 8 minutes required to complete both surveys annually.

13. The total annual cost burden

*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. The cost estimate should be split into two components -- (a) a total capital and start-up cost component and (b) a total operation and maintenance and purchase of services component....*

There are no additional costs as a result of this information collection.

14. Annualized Cost to the Federal Government

*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.*

There is minimal cost to the Government as this form will be online where respondents will submit their information electronically.

15. Explanation of program changes in Items 13 or 14 on OMB Form 83-I

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

Not applicable. This is a new information collection.

16. Collection of information whose results will be published.

*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...*

Any reporting of the collected information will be at the aggregate level and not contain individual PII.

17. Expiration date for collection of information

*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.*

Not applicable. The expiration date will be displayed.

18. Exceptions to certification in block 19 on OMB Form 83-I

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

No exceptions.

**B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS**

*Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used.*

The respondents who will be selected for the post course surveys extend to all service members, veterans and dependents that have completed any of the Boots to Business courses (approximately 15,000 respondents, annually). There is no sampling as all participants will receive the surveys upon course completion. In addition, the method used to collect this information is an online survey that respondents will receive via email. The expected response rate is 25% based on the population and structure and length of the surveys. The post course surveys are completely voluntary and have not been conducted previously.

OVBD plans to use the information collected to determine quality and overall satisfaction in addition to participant outcomes achieved after attending Boots to Business courses. Results will help SBA direct course content to improve participants' entrepreneurial decision making.

Although the surveys are completely voluntary, email reminders will be sent to deal with issues of non-response. A maximum of two email reminders will be sent within the three week period following the initial invitation. In addition, the value of the survey is communicated to participants through all of the Boots to Business courses.

A test of procedures and methods was completed with 7 potential respondents to better refine the surveys language and minimize the burden. On average, the potential respondents completed each survey in 4 minutes.