

**SUPPORTING STATEMENT for OMB Form 83-1**  
**New 8(a) Participant Benefits Report Form**

**A. Justification:**

1. Circumstances necessitating the collection of information.

The SBA 8(a) Business Development Program (8(a) BD program) as authorized by sections 7(j)(10) and 8(a) of the Small Business Act (Act) (15 U.S.C. 636(j)(10) and 637(a), was created to assist eligible small disadvantaged business concerns ( Program Participants) compete in the American economy through business development assistance. This information collection is required by 8(a) program regulations at 13 CFR 124.604, which states:

As part of its annual review submission, each Participant owned by a Tribe, ANC, NHO or CDC must submit to SBA information showing how the Tribe, ANC, NHO or CDC has provided benefits to the Tribal or native members and/or the Tribal, native or other community due to the Tribe's/ANC's/NHO's/CDC's participation in the 8(a) BD program through one or more firms. This data includes information relating to funding cultural programs, employment assistance, jobs, scholarships, internships, subsistence activities, and other services provided by the Tribe, ANC, NHO or CDC to the affected community.”

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

Each Tribal, ANC, NHO and CDC-owned small business concern certified to participate in the SBA 8(a) BD program is required to report this benefits information along with its 8(a) Annual Update (SBA Form 1450). The information is reviewed by the Participant’s BOS to help SBA determine whether the entity that owns the Program Participant provided benefits to the applicable Tribal or native members and/or Tribal, native or other community.

3. Technological collection techniques.

The 8(a) Participant Benefits Report form is accessible electronically. The 8(a) Participant can electronically enter and/or modify its information using SBA’s data system to complete and submit the form for review by accessing [https://eweb.sba.gov/gls/dsp\\_login.cfm?SB=Y](https://eweb.sba.gov/gls/dsp_login.cfm?SB=Y) However, the firm must submit a hard copy of the certification page **only** containing a “wet signature” of the President, Partner or Proprietor. This document should be sent to the firm’s assigned BOS located at the servicing District office.

4. Avoidance of Duplication.

There is no duplication of information. This information will be unique to each annual reporting period and is not available from any source other than the 8(a) Program Participant.

5. Impact on small businesses or other small entities.

This information collection will only have a minimal impact on the responding small business concerns. The Agency is reducing administrative burden by requesting only the information necessary to check for compliance with the benefits reporting requirement and only requesting additional information if our review indicates that further analysis is needed.

6. Consequences if collection of information is not conducted.

The information is necessary to help the SBA determine if the Tribe, ANC, NHO or CDC owning an 8(a) BD Participant has provided benefits to the Tribal or native members and/or the Tribal, native or other community, including funding cultural programs, employment assistance, jobs, scholarships, internships, subsistence activities, and other services provided by the Tribe, ANC, NHO or CDC to the affected community. If the information is not collected the SBA cannot effectively detect if the mentioned concerns are utilizing the benefits of the program to give back to their community.

7. Existence of special circumstances.

No special circumstances exist.

8. Solicitation of Public Comment.

SBA published the 60-day comment notice in the Federal Register on May 20, 2015 at 80 FR 29143, and subsequently published a revised notice on June 2, 2015 at 80 FR 31444. The comment period ended on August 3, 2015. SBA received 4 comments from entity-owned firms and an association of such firms. These commenters responded favorably, but requested the ability to include an optional narrative in addition to the form and for SBA not to publish aggregated data. The SBA concurred with allowing the entity-owned firm to include an optional narrative; however the aggregated data is published in the annual report to Congress on the 8(a) BD program.

The proposed one page form was released to several associations and representatives of Tribes, ANCs, NHOs and CDCs for comment, along with an invitation for tribal consultations. The SBA completed five consultations in 2015, including in-person in DC, Tulsa, and Anchorage, as well as two over the phone for those who could not travel. We took comments from our American Indian, Alaskan Native, and Native Hawaiian constituents regarding the benefits report form. Some felt that the form should be longer with more specificity, while some advocated for no form at all without any standard questions given the unique way in which each tribal entity may experience benefits. Consensus was not clearly formed, but after providing drafts of the latest iteration no strong objections were heard during the consultation.

9. Payment or gifts.

No payments or gifts will be provided to any respondent in connection with this information collection.

10. Assurance of confidentiality.

There are no assurances of confidentiality. However, SBA will protect the information collected to the extent permitted by law, including the Freedom of Information Act, 5.U.S.C. 552.

11. Questions of a sensitive nature.

No information of a sensitive nature is requested.

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

The estimated completion time for the new 8(a) Participant Benefits Report Form is **0.50 hours** per Participant. Each of the SBA 8(a) Tribe's/ANC's/NHO's/CDC's BD program Participants will complete and submit this Form to the SBA annually. At the time of this submission there were **329** Tribe/ANC/NHO/CDC-owned firms in the program. Since the submission is made annually by each firm, the number of annual responses would be approximately **329**. Assuming approximately 100 percent for overhead, general and administrative, and other employee associated costs, the Participant's time will cost the company approximately **\$75.00** per hour. Total approximate annual responses of **329** at **0.50 hours** would equal **164.50** hours. At **\$75.00** per hour, the **164.50** hours of company time for preparation will cost **\$12,337.50**. The calculation for the annual burden to complete the form is as follows:

**329** Participants x **1** submissions per year = **329** annual submissions  
**329** submissions x **.50** hours per completion = **164.50** hours  
**164.50** hours x **\$75.00** per hour = **\$12,337.50** total burden cost on Participants.

13. Estimate of total annual cost burden for submission.

There are neither capital/start-up costs to the respondents nor purchase of services components for the respondents as a result of this collection.

14. Estimated annualized cost to the Federal government

The review of the 8(a) Participant Benefits Report Form will be performed by a BOS at level GS-12/1 and will take approximately **0.50 hours**. The cost for the GS-12/1 to perform this task is **\$36.60** per hour (The wage rate used was that of a GS-12/1 grade level, 2015-DCB (DC and Baltimore), incorporating the 1.00% General Schedule increase and a locality payment of 24.22%, for the locality pay area of Washington-Baltimore-Northern Virginia, DC-MD-VA-WV-PA, effective January 2015. Assuming approximately **329** submissions, the total hours for review is **164.50**. At **\$36.60** cost per hour, the total cost for the review by the Business Opportunity Specialists is **\$6,020.70**.

The calculation for the estimated annual cost to the Federal government to review the form is as follows:

$$\begin{aligned} 329 \text{ submissions} \times .50 \text{ hours per completion} &= \mathbf{164.50 \text{ hours}} \\ 164.50 \text{ hours} \times \$36.60 \text{ per hour} &= \mathbf{\$6,020.705.} \end{aligned}$$

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

Not Applicable; new collection.

16. Collection of information whose results will be published.

The information collected will not be published.

17. Expiration date for collection of information.

Not applicable as SBA will display the OMB approval date.

18. Exceptions to certifications in Block 19 on OMB Form 83-1.

Not applicable.

**B. Collection of Information Employing Statistical Methods:**

This collection of information does not employ statistical methods.