

To the Office of Management and Budget,

The U.S. Department of the Treasury State Small Business Credit Initiative (SSBCI) recently received approval of an information collection request¹ from the Office of Management and Budget (OMB) for the collection of additional data fields beyond the required data fields stipulated in the allocation agreements with Participating States². Reporting of these additional data fields will be optional for Participating States.

Since approval of the request to collect these optional data fields, SSBCI has identified an additional three optional data fields that would be of great assistance in measuring program impact. These additional optional data fields are described below:

- **Business EIN** – employer identification number of the business receiving SSBCI investment
- **Business Name** – name of the business receiving SSBCI investment
- **Business Address** – street address of the business receiving SSBCI investment

SSBCI requests the approval from OMB to add the above outlined data fields as additional optional data fields to be requested with the information collection which has been approved by OMB.

These three additional optional data fields would be distinct from the optional data fields identified in the information collection request which has already been approved by OMB in that these three additional optional data fields would not be published, but would be used to SSBCI's internal impact analysis and kept confidential. These additional optional data fields would allow SSBCI to track the performance of companies receiving SSBCI venture capital program investment over time to better assess program impact. Any reporting of program impact would be at the aggregate level, and the business identifying information requested in the three aforementioned additional optional data points would, as stated, remain confidential.

SSBCI believes that the request to add these additional optional data points constitutes a non-material, non-substantive change to the information collection request that has already been approved by OMB, principally because of the optional nature of the collection and the confidentiality of the reporting. The addition of these three additional optional data fields does not change any reporting requirements as these data fields are optional, and the addition of the three additional optional data fields does not change any publication or information that would be made public as reporting on these three additional optional data fields would remain confidential.

SSBCI thus requests the prompt approval from OMB to add the above outlined data fields as additional optional data fields to be requested with the information collection which has been approved by OMB. The collection of this information is scheduled for December 31, 2016, through March 31, 2016, however SSBCI provides guidance to states in preparing for this reporting and would like to confirm the information collection template by November 30, 2016, if possible. Thus, your prompt response would be greatly appreciated. Thank you!

¹ OMB Control Number 1505-0227

² Treasury approved applications from 47 states, the District of Columbia, five territories, and municipalities in three states (collectively referred to as "states")

Best regards,

David Cervantes
SSBCI