

United States Department of Energy
“Small Business Innovation Research (SBIR) and Small Business Technology
Transfer (STTR) Commercialization Survey”
Supporting Statement
OMB Number 1910-5166

This supporting statement provides additional information regarding the Department of Energy’s (DOE) request for processing of the regular information collection, SBIR/STTR Commercialization Survey. The numbered questions correspond to the order shown on the Office of Management and Budget (OMB) Form 83-I, “Instructions for Completing OMB Form 83-I.”

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 SBIR Program Reauthorization Act of 1992 (Public Law 102-564), directs participating Federal agencies to gather and evaluate SBIR awards in terms of: “(i) the small business concern’s record of successfully utilizing and commercializing SBIR . . . research; (ii) the existence of second phase funding commitments from private sector or non-SBIR funding sources; and, (iii) the existence of third phase, follow-on commitments for the subject of the research.”

Additionally, the Small Business Reauthorization Act of 2000 (Public Law 106-554) cites the importance of “output and outcome data . . . and any other data collected by or available to any Federal agency that such agency considers may be useful for SBIR program evaluation.” Section 11., (e), (10), (i) of the SBIR Reauthorization Act of 2000 Policy Directive, issued by the Small Business Administration (SBA) pursuant to 15 U.S.C. 638(k), requests agencies to provide SBA, annually, with “(i) information on revenue from the sale of new products or services resulting from the research conducted under each Phase II award; (ii) information on additional investment from any source, other than Phase I or Phase II SBIR or STTR awards, to further the research and development conducted under each Phase II award; and (iii) any other information received in connection with the award that the Administrator, in conjunction with the SBIR program managers of the participating agencies, considers relevant and appropriate.”

Therefore, DOE has developed a survey designed to gather small business commercial activity data associated with technologies funded via the DOE SBIR/STTR programs. The information collection effort provides this information and is necessary in order for DOE to meet its obligations as directed by the Small Business Reauthorization Act of 2000.

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.**

The data is compiled and aggregated on an annual basis to depict the extent to which commercial applications and related commercial activity have resulted from DOE-funded SBIR/STTR innovations and technologies. These results are used by DOE for: 1) demonstrating to the Administration, Congress, and to the public the commercial impact of the DOE SBIR/STTR program and the extent to which DOE is meeting its obligations under the law; and 2) guiding DOE's SBIR/STTR program implementation for the purpose of placing greater program emphasis on commercialization of DOE-funded SBIR/STTR technologies. All such information collected from SBIR/STTR awardees is displayed in an aggregated form to protect company-specific and therefore commercially sensitive information. Without the information collection effort, DOE would be unable to determine the commercial impact of its SBIR/STTR program with sufficient accuracy and credibility. Currently, the subject information collection effort provides the only reliable and sufficiently comprehensive database of DOE SBIR/STTR commercial outcome results.

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.**

The data collection instrument is fully automated and administered in an electronic format. DOE SBIR/STTR survey participants are notified via email and able to securely access their respective award data, update it, and provide survey responses in a 100% paperless format. Therefore, electronic collection and submission of the subject information is available to 100% of all surveyed firms, thus greatly reducing the burden upon each participant.

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.**

This information is not currently available on a DOE-specific basis to meet DOE's SBIR/STTR program evaluation needs and obligations under the law. The information collected under this survey effort enables DOE to respond with factual, auditable, comprehensive, and specific answers to specific questions by Congress, the Government and Accountability Office (GAO), DOE Inspector General, as well as by the DOE senior leadership, and the Office of Management and Budget.

The SBIR/STTR survey participants are able to respond to this data collection effort by using existing company-specific information already prepared by each small business in preparing grant proposal applications for SBIR/STTR awards, thus reducing the burden on respondents. In addition, survey participants may combine multiple DOE-funded SBIR/STTR projects into a single response, thus reducing a duplication of effort.

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.

To ensure that this information collection effort does not have a significant economic impact on a substantial number of DOE SBIR/STTR small businesses, the DOE SBIR/STTR Programs Office is surveying only those firms that are no longer active with the DOE SBIR/STTR program. Each survey will span a fixed 10 year period, e.g., the FY 2012 survey population included awardees from 1997-2006. This 10 year period will change by one-year increments, sequentially each year, e.g., 2014 survey population included awardees from 1998-2007, etc.

Surveying in this manner ensures that not all DOE SBIR/STTR Phase II firms will be surveyed each year. Those firms that have provided their respective commercial history via a current DOE SBIR/STTR grant proposal will not be surveyed for five years following their last active SBIR or STTR award with DOE. This five year period provides each small business with a reasonable amount of time to achieve some commercial results. Additionally, those firms that responded to a survey will not be re-surveyed if they continue to submit any proposals for DOE SBIR/STTR grants, and include full commercial histories with those proposals.

In the past, the DOE SBIR/STTR awardees were surveyed using email as the means to transmit a Microsoft Excel ICR. This ICR is no longer administered via email, but via the DOE Office of Science Portfolio Analysis and Management System (PAMS). Company specific data such as firm name, business official contact information, award number, and project title are already recorded in PAMS and the relative fields automatically filled, thus reducing the time needed by the small business to complete the ICR.

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 such restrictions were placed on the collection of this information, DOE would be unable to determine and credibly report the extent to which its SBIR/STTR program is meeting the objectives of the SBIR/STTR authorizing legislation. Also, DOE would not be able to provide substantive and specific responses to specific questions from Congress and the GAO, as well as to address internal queries from DOE senior leadership for information regarding DOE SBIR/STTR program outcomes. The necessary, DOE-specific, small business data do not currently exist elsewhere.

Less frequently collected data would significantly impact the accuracy and current relevancy of the SBA request for annual SBIR/STTR small business commercialization data, particularly given that the universe of firms having won DOE Phase II SBIR/STTR awards grows each year. Currently, about 25% of the firms winning DOE SBIR/STTR Phase II awards each year are firms that have not previously won a DOE SBIR/STTR Phase II award.

7. **Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines: (a) requiring respondents to report information to the agency more often than quarterly; (b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; (c) requiring respondents to submit more than an original and two copies of any document; (d) requiring respondents to retain records, other than health, medical government contract, grant-in-aid, or tax records, for more than three years; (e) in connection with a statistical survey, that is not designed to product valid and reliable results that can be generalized to the universe of study; (f) requiring the use of statistical data classification that has not been reviewed and approved by OMB; (g) that includes a pledge of confidentiality that is not supported by authority established in stature of 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; (h) requiring respondents to submit proprietary trade secrets, 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 none. The package is 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. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

The Department published a 60-day *Federal Register Notice* and Request for Comments concerning this collection in the *Federal Register* on March 8, 2018,

volume 83, number 46, and page number 9851. The notice described the collection and invited interested parties to submit comments or recommendations regarding the collection. No comments were received.

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

No payment or gift to respondents is being proposed under this information collection.

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

The data collection instrument contains the following statement: *“Please be assured that all survey responses are treated confidentially and none of the data are released to anyone outside of the DOE and will only be used for internal management, assessment, or communications relating to the DOE SBIR/STTR programs. And finally, all data provided via this survey are used in the aggregate with no company-specific identifiers, including sensitive, proprietary, or financial data.”*

Accordingly, the information and data collected is not to be made publicly or otherwise available on an individual firm basis. In particular, commercial data of a private entity such as an SBIR/STTR small business is exempt from Freedom of Information Act requests. Therefore, this information will not be made publicly available, under law, on an individual company basis. The data is made publicly available only on an aggregated basis over all of the companies.

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 questions of a personally sensitive nature, such as sexual behavior and attitudes, and religious beliefs are included in this information collection. The information collected is of a financial nature.

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

Approximately 2,500 SBIR/STTR Phase II firms are surveyed each fiscal year. However, not all DOE SBIR/STTR Phase II firms will be surveyed each year. Those firms that have provided their respective commercial history in the most recent DOE SBIR/STTR grant proposals may not be surveyed, if the data contained in those grant proposals is sufficiently detailed as required by the DOE SBIR/STTR Funding Opportunity Announcements. Those firms that respond to a survey may not be re-

surveyed, if they continue to submit proposals for SBIR/STTR grants, including full commercial histories with those proposals.

Respondent firms are not required to compile detailed data from financial accounting records. Summary results, typically provided by even very basic financial accounting systems will yield most, if not all of the requested data. The DOE SBIR/STTR Programs Office believes that the management of a small business firm is sufficiently familiar with the success of the firm's products and services to be able to provide much of the requested data and information. Accordingly, based on prior, similar DOE SBIR/STTR commercialization survey efforts with small businesses, it is estimated that the online data collection instrument requires an average of one hour or less to compile financial data and complete the survey for a single SBIR or STTR award.

The estimate of hour burden of the information collection is as follows:

Total number of unduplicated respondents: 2,500
Reports filed per person: 1
Total annual responses: 2,500
Total annual burden hours: 2,500 hours

Average Burden:

Per Collection: 1 hour
Per Applicant: 1 hour

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).

The DOE SBIR/STTR Programs Office anticipates that the data collection survey will be completed by a small business staff member at the request of the company president. Under an assumption that the designated staff member has an annual salary of not more than about \$100,000, the total resulting annual cost to the private sector amounts to about \$120,000, given a 100% response rate. That is, $\$100K/2,080$ hours = \$48 per hour. $\$48 \times 2,500$ (100% of respondents) = \$120,000 total annual data collection cost or \$48 per small business.

14. Provide estimates of annualized costs to the Federal government.

It is estimated that the collection, compilation, and evaluation of this information, along with corresponding use of computer software analysis requires approximately one-quarter (.25) of a Full-Time Equivalent GS-14 federal staff person per year or approximately \$83,000 per year. Though the DOE SBIR/STTR Programs Office is using an online survey application, there are no additional capital costs, beyond the existing IT infrastructure, incurred to create the survey instrument. One IT contractor support staff person at 10% resource-effort per year is used to monitor and administer

the survey and approximately 5% resource-effort to maintain the software application and address IT issues at a cost of \$10,000 per support contractor year. There are no other federal or contractor personnel involved in administering and maintaining the survey effort.

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

The annualized cost reported in item 14 was adjusted to reflect loaded wages. The previous figure had been calculated using unloaded wages. The costs associated with the information collection effort indicated in 4 are reported in Item 14 of the OMB Form 83-I.

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.

The information collected is compiled, analyzed, and utilized for internal DOE purposes as well as for responding to inquiries from Congressional staff, the GAO, and the OMB. Accordingly, the information and data collected will not be made publicly or otherwise available on an individual firm basis. The data are made publicly available only on an aggregated basis over all of the companies.

No complex analytical techniques will be used to tabulate the data collected. The entire data collection effort will take no longer than 21 days from the beginning of the data collection. The internal calculation and evaluation of data will be employed continuously as needed.

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.

DOE is not seeking approval to not display the expiration date for OMB approval of this 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.