

U.S. Small Business Administration
Boots to Business Course Registration

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 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, [section 32\(d\) of the Small Business Act, 15 U.S.C. 657b\(d\)](#) specifically requires SBA to “regularly participate in the workshops of the Transition Assistance Program....”

Boots to Business (B2B) is an entrepreneurial education initiative offered by the U.S. Small Business Administration (SBA) as a career track within the U.S. Department of Defense (DOD) Transition GPS Program to comply with these statutory requirements. B2B is one of three optional training tracks within Transition GPS (T-GPS). The B2B curriculum provides 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 technical assistance.

After participating in the two-day Intro to Entrepreneurship workshop, transitioning Service members and their spouses may access other SBA-sponsored entrepreneurial development training opportunities online. Veterans who have already transitioned may access SBA entrepreneurial development services through the B2B|Reboot workshop.

SBA has streamlined the information currently approved for collection. The agency has determined that some of the information is either unnecessary for the registration process or more appropriately collected as part of the post-B2B course collection of information, OMB Control Number 3245-0390. As a result of the changes, information collected will be restricted to brief demographic and Service-related data. In addition, the burden on Service members will also be reduced.

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.

SBA uses this form to collect course registration and attendance data for all of the B2B courses for eligible Service members, veterans, and their spouses. This collection enables the Program to report overall participation and to better identify ways to improve its marketing and outreach.

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.

SBA OVBD's initial plan was to transition from using a paper-based B2B course registration forms to an online form permitting electronic responses, which would ultimately lessen the burden on respondents. The Program is making incremental progress towards this goal and has attained the authority to operate (ATO) a customer relationship management (CRM) system which supports the streamlining of program operations. However, operational and technical constraints are impeding quick progress towards this goal. Currently, information is collected manually. To reduce this burden, SBA has reduced the information collection to the minimum amount of data needed to achieve its purpose.

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.

Although other forms were considered and reviewed in the creation of the Boots to Business Course Registration form, there are data points unique to the Boots to Business Program not captured on these other forms. This collection enables the Program to report overall participation and to better identify ways to improve its marketing and outreach.

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.

Most of the Boots to Business participants are transitioning Service members who are interested in becoming entrepreneurs but have not done so yet. Regarding the B2B|Reboot course, there is some potential that the veteran participants are currently business owners; however, there is no significant economic impact on these 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.

If the collection is not conducted, the Boots to Business Program will be unable to gather the data critical to measuring program participation and understanding who has actually attended the course from among the eligible population.

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, the 60-day Federal Register notice was published on November 24, 2017, at 82 FR 55914 for renewal of this form. The comment period closed on January 23, 2018. 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 top of the registration form, respondents are asked to permit SBA the use of their name and contact information for the receipt of 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 form, why the program requests the information, and how their information is collected under SBA SOR 5- Business and community initiatives and subject to the Privacy Act of 1974 and the Freedom of Information Act.

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 gender, race, ethnicity, transition type, and years of service are requested in order to track the reach of the Boots to Business course among Service members. This data assists the Program in identifying potential marketing and outreach gaps to better reach specific populations. The Program can also use this data to identify trends among participants and gauge program impact in reaching specific audiences. Honorable discharge status is requested in a yes or no format to ensure veterans are qualified to attend the B2B|Reboot course which requires veterans be honorably discharged in order to attend the course.

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 17,000 annual respondents are expected to register and/or attend B2B courses, thus completing the form. The annual hour burden is determined to be about 1,420 hours. The estimate is based upon a consultation with 7 potential respondents who sampled the draft registration form, averaging 5 minutes for completion.

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....

The average total annual cost burden to respondents is \$37,400. The estimate is based on the average monthly salary (pay grade) of transitioning Service members and the 5 minutes to complete the registration. The individual cost burden is approximately \$2.20.

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 a result of this information collection.

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

This is a revision to a currently approved information collection. Although SBA expects more respondents based on past experience, SBA has reduced the collection burden to the minimum amount of data needed to achieve its purpose. As a result, the estimated average time for a respondent to complete the collection tool has been reduced from 12 minutes to about five minutes.

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 is at the aggregate level and does 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.

SBA will display the expiration date.

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

We have no exceptions.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent select

None.