

**SUPPORTING STATEMENT
U.S Department of Commerce
Minority Business Development Agency
Online Performance Database
OMB Control Number 0640-0002**

A. JUSTIFICATION

This information collection request is to extend the Office of Management and Budget approval.

1. Explain the circumstances that make the collection of information necessary.

As provided in Executive Order 11625 (issued October 13, 1971), the Minority Business Development's Agency's (MBDA) primary mission is to increase the opportunity for minorities to participate in our national economy through the formation and development of competitive minority-owned firms. To this end, MBDA awards cooperative agreements and grants for the delivery of management and technical assistance services directly to minority entrepreneurs.

The purpose of the Online Performance database is to provide an electronic system for (1) entering the accomplishments of MBDA's grant recipients. The database is maintained and accessible by MBDA and business center staff through MBDA's Business Internet Portal at: www.mbda.gov.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

PERFORMANCE DATABASE

Specific uses of the Online Performance Database include:

- The documentation of actual performance accomplishments of each funded center (*i.e.*, MBDA grant recipient) compared with stated goals in the respective cooperative agreement and financial assistance award with MBDA. The Performance Database permits tracking of each center's goals using a number of general and specific variables. The flexibility of the database permits new variables to be added as needed.
- The verification of the summary performance accomplishments cited in the narrative reports. Based on the results, performance data and other qualitative information obtained during MBDA quarterly monitoring will determine whether a specific cooperative

agreement or grant should be terminated or other actions are needed to improve program performance.

- Tracks weekly/monthly/quarterly performance. This enables managers to identify and address performance problems in early stages.
- Identifies minority business clients and MBEs receiving agency-sponsored business development services in the form of management and technical assistance, the kind of assistance each receives, and the impact of that assistance on the growth and profitability of the client firms.
- Generates special reports analyzing program activities and services by business types, industry trends, business starts, geographic profiles, successful capital and marketing opportunities, and other program elements.
- The system permits client identification using a unique computer-assigned identifier for each funded center. The identification is related to all client data fields. These data fields include number of clients assisted, types of assistance, number of hours of assistance, dollar value of all secured transactions, as well as the number of other variables available for analysis with respect to each client, funded center, or MBE.

The purpose of this collection is to establish a framework for assessing and evaluating a project's performance. MBDA requires this information to monitor, evaluate, and plan Agency programs which effectively enhance the development of the minority business sector. Using the information collected, MBDA produces ad hoc and recurring reports on its funded centers, broad agency announcements, client services activities and accomplishments. Because MBDA's major funded activity is client service, the reports generated are a primary agency reporting and planning mechanism.

The data collection activity is comprised of quarterly accomplishments of each cooperative agreement or grant consistent with the terms and conditions of the funding instrument or announcement and provides MBDA with the grantee's actual accomplishments at the end of each reporting period. MBDA staff enters the grantee's yearly goals at the time of award.

The online Performance database enables reporting entities to update database files in real time via secure Internet and dial-up transactions. The graphic user interface (GUI) is simple to understand and operate and has a built-in capability to detect errors at the time of entry to ensure more accurate data input.

MBDA Managers have the capability to monitor progress of projects on a day-to-day basis instead of waiting for quarterly reports to be submitted. The online, real-time interface permits reporting entities to have full-time access to the database for internal management. This standardizes the reporting methodologies throughout the system. This system has removed several steps from the reporting process, with attendant savings in paperwork-burden hours.

The Performance system documents “successes” in an accurate and definitive fashion. Each contract, loan and other minority business benefit is tabulated chronologically in the database so that a progress history of each client can be tracked throughout the life of the client’s association with MBDA. The increases in number of employees and minority employees, size, number and type of contracts, increase in capitalization, export and domestic market data, advancement in certification, North American Industry Classification Standards and Standard Industry Industrial Codes-related information, and other growth and programmatic criteria is collected. The Performance database is designed to meet the goals and objectives of the Government Performance Results Act (GPRA), and the technological construct of the system ensures accurate, timely reporting and ensures the strict security of privacy-protected data while maintaining a focus on the reduction of paperwork burden to the public.

MBDA estimates that the overall cost savings and paperwork reduction enabled by the Online Performance Database is significant as compared to collecting such information via paper submissions. The information collected is for MBDA internal analysis and programmatic decision-making and is not generally disseminated to the public.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

The subject information collection is captured electronically via MBDA’s Internet-based platform where data is gathered from all MBDA clients, funded centers, and program participants. MBDA makes every effort, through training and publications for the online database, to educate the minority business community on the use of this system and to minimize the amount of time organizations spend on data entry. The Performance system enables input on a daily basis. The Manager is able to track funded organizations’ performance from their desktops.

Information required can be entered via the Internet into the system daily, i.e., whenever a new client is registered or assistance is provided. A secure password system permits companies to access their Phoenix record at any time to submit and record changes.

MBDA has an integrated World Wide Web site and intranet portal to provide information to the public, the Department, and other interested entities. Minority business growth is tracked by increases in employment, gross sales, export sales, contract size increases and industry. Because the database organizes information in a standard format, it can be used, and shared, with data from other sources (Census, Labor Department, etc.) to measure various elements of evaluative interest.

In the previous PRA submission to the Office of Management and Budget (OMB), MBDA described the implemented an online template through which funded centers submit their programmatic Semi-Annual Year-End Narrative Reports. The online program reporting system has served to further reduce the paperwork burden on our funded centers.

4. Describe efforts to identify duplication.

The requirements in the Performance system do not duplicate other MBDA program reporting requirements. Funding information is incorporated into the Performance database within the funded center's block of data fields. Status of account, time left on grant, amount of grant, and details about the funded center, such as name of contact, address, phone, fax, email address, website, and a number of other variables permit budget and program evaluation criteria to be reported in a more timely and cost-effective manner.

MBDA and other Federal agencies, e.g. the Small Business Administration, have fundamentally different missions and thus serve minority businesses in different ways. Many emerging minority businesses may have revenues that exceed other agencies' service cap requirements. Such businesses often need the assistance MBDA can provide. MBDA-funded centers and programs provide direct one-on-one business development services to minority businesses. This personalized approach differs from the generalized course of training business assistance offered by other government entities.

5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

MBDA provides standard guidelines for entering information into each database. These guidelines apply to all client service programs and impose equal burden on all respondents. The collection effort is required "across the board" and affects all companies working with MBDA. All databases are on-line to facilitate the ease of collection through the use of the Internet.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

The data collected through the Performance database are used to regularly monitor and evaluate the progress of MBDA's funded centers and financial assistance programs, to provide the Department and OMB with a summary of the quantitative information that it requires about government supported programs, and to implement the GPRA. This information is also summarized and included in the MBDA Annual Performance Report, which is made available to the public. If collected less frequently, the information would likely not be as timely, which could result in the missing of opportunities to proactively identify and resolve programmatic deficiencies.

This monitoring via the Performance system assures time and work schedules are met in accordance with cooperative agreement requirements. MBDA requires Semi-Annual and Annual Narrative Reports from its funded centers. Should a problem arise with compliance, less frequent submissions would diminish the opportunity for project monitors to make a timely response with corrective action, and therefore, the Performance database is critical. The programmatic deficiencies could remain unchecked prior to the process for making

recommendations for renewal funding, and would adversely impact the delivery of quality services to MBDA's constituency.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

There are no special circumstances that require this collection to be conducted in a manner inconsistent with the general information collection guidelines. MBDA requires the regular (within 72 hours from time of service) entry of data by its funded organizations.

The information is used as a management tool in determining the justification for the refunding of its projects, their real-time accomplishments, the appropriateness of needed intervention prior to the required on-site monitoring visits by MBDA regional office staff, and to address necessary changes in policy. This information that is captured on a regular basis is automatically incorporated into the Semi-Annual and Year-End Narrative Reports.

8. Provide a copy of the PRA Federal Register notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the 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.

On February 13, 2019, a federal register notice was published soliciting public comments on the information collections pertaining to OMB Control Number 0640-0002.

No comments were received.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

There are no payments of gifts to respondents.

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

There is no assurance of confidentiality provided to respondents of this information collection. However, MBDA will not release information collected through the Performance system, other than in connection with a FOIA request and then only to the extent that the requested information is not protected from disclosure under FOIA. MBDA also notes that the security functions of the

Performance system enables the administrator to open and close access to information as directed by management and as necessary to respond to outside threats.

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.

MBDA collects information regarding the minority status of persons receiving services from the Agency and from its funded centers. This information is collected via a self-certification in order to ensure that MBDA is operating within the parameters of Executive Order 11625 and 15 C.F.R. part 1400. MBDA also notes that data may be entered into the Opportunity system without regard to the minority status of the opportunity provider.

12. Provide an estimate in hours of the burden of collection of information.

It is estimated that 10,615 respondents will participate in

Performance Database: 4,496 hours

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the cost of any hour | burden shown in Question 12).

This collection of information does not include any cost burden to respondents.

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

Performance Database:	MBDA staff	\$534,820
	MBDA IT Contractors	\$383,807
	Cost to government	\$918,627

Total Cost: \$1,162,119

15. Explain the reasons for any program changes or adjustments.

As set forth below, MBDA has experienced a substantial increase in the number of respondents and responses for these information collections since its last PRA submission. The adjustment increase in respondents and responses has led to a 2,496 hour overall increase to the total estimated burden hours attributable to these collections. Despite this overall burden hour increase, the average estimated burden hour per respondent actually decreased significantly from 30 minutes to 10 minutes, which is primarily attributable to system upgrades and the overall streamlining of these collections.

	Annual Number of Respondents	Annual Number of Responses	Annual Total Burden Hours	Average Burden Hour Per Respondent
Current Data Collections	6,732	10,594	5,297	30 minutes
Revised Data Collections	10,615	46,621	7,802	10 minutes

16. For collections of information whose results will be published, outline the plans for tabulation and publication.

Data from the Performance system is collected primarily for internal review purposes and to monitor and evaluate the MBDA funded organizations. The data will be used to conduct federal research and studies on minority businesses to support policy. This data is also summarized and reported to the Department and to OMB as part of the GPRA reporting process and is also summarized in the MBDA Annual Performance Report (which is made publicly available). Reports concerning the characteristics and performance of the MBDA funded centers will include statistical tables and charts generated from the Performance databases. When publishing this data it will be clearly stated that the results are not statistically representative and cannot be generalized across any geographic, demographic or industry group.

17. If seeking approval to not display the expiration date of OMB approval of the information collection, explain the reasons why display would be inappropriate.

The appropriate OMB control number and expiration date will be displayed.

18. Explain each exception to the certification statement.

No exceptions to the certification statement apply.

B. COLLECTONS OF INFORMATION EMPLOYING STATISTICAL METHODS

These information collections do not employ statistical methods. MBDA is not aware of any statistical sampling methods that might reduce burden or improve the accuracy of results.