

JUSTIFICATION FOR NON-SUBSTANTIVE CHANGES

1. Justification for Requested Changes

The current DFC-001 allows respondents to apply only for direct debt support. These modifications will allow the flexibility for applicants to request both direct equity or direct debt in one DFC form. This will eliminate a potentially duplicative requirement to complete a separate direct equity application form, thereby increasing clarity and efficiency for both clients and DFC personnel. There is no change to the type or amount of information requested since the information needed to begin underwriting either type of support is the same, only adjustments to terminology to accommodate both types of support. Since direct equity is a new product being introduced by DFC, we have no historical data by which to gauge the incremental increase in applications that this new offering may elicit. Our present expectation is that interest will increase very slowly, so DFC has assumed an increase of 20 applications per year over the previously approved burden estimate.

2. The estimated burden of collecting this information is as follows:

240 respondents
x 1 per respondent
=240 total annual responses
x (1.5 hours per average respondent)
=360 respondent hours
x \$75/hour for personnel, record-keeping, overhead
\$27,000.00 total cost to respondents

3. The estimated annualized cost to the Federal government is as follows:

240	respondents per year
x 1	per respondent
240	total annual responses
x 1	average hours to review one response
240	total federal hours
x \$56.15	GS-14/1 (DCB) hourly wage
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\$13,476.00	total cost to the Federal government