

## JUSTIFICATION FOR NON-SUBSTANTIVE CHANGES

### 1. Justification for Requested Changes

The current DFC-001 allows respondents to apply for both debt and equity support. As some debt questions are not relevant for equity and vice versa, splitting DFC-001 into two slightly modified, separate applications with more precise debt and equity terminology will reduce confusion and improve efficiency. The version used for debt applications will be DFC-001A and the version used for direct equity applications will be DFC-001B. While the type and amount of information is very similar for both forms, separate debt and equity versions of DFC-001 will also reduce overall collection by eliminating certain questions for debt that do not apply to equity. Specifically, existing question #1 and question #7 will be eliminated from the equity form, and the terms such as “Borrower” and “Investee” will be split onto their respective debt and equity forms. These changes will provide better clarity for respondents and reduce the overall collection burden.

### 2. There is no change to the estimated burden of collection, however the burden will be split between the two version as follows:

DFC-001A – Application for Debt Finance  
220 respondents  
x 1 per respondent  
=220 total annual responses  
x (1.5 hours per average respondent)  
=330 respondent hours  
x \$75/hour for personnel, record-keeping, overhead  
\$24,750.00 total cost to respondents

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DFC-001B – Application for Direct Equity Investment  
20 respondents  
x 1 per respondent  
=20 total annual responses  
x (1.5 hours per average respondent)  
=30 respondent hours  
x \$75/hour for personnel, record-keeping, overhead  
\$2,250.00 total cost to respondents

### 3. There is no change to the estimated annualized cost to the Federal government, however

the cost will be split between the two versions as follows:

DFC-001A – Application for Debt Finance

220	respondents per year
x 1	per respondent
220	total annual responses
x 1	average hours to review one response
220	total federal hours
x \$56.15	GS-14/1 (DCB) hourly wage
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\$12,353.00	total cost to the Federal government

DFC-001B – Application for Direct Equity Investment

20	respondents per year
x 1	per respondent
20	total annual responses
x 1	average hours to review one response
20	total federal hours
x \$56.15	GS-14/1 (DCB) hourly wage
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\$1,123.00	total cost to the Federal government