

U.S. Small Business Administration
Boots to Business Post Course Surveys
OMB Control Number, (If applicable)
Justification – Part A Supporting Statement

Overview of Information Collection: Provide a brief overview of the information being collected and disclosed, and/or the recordkeeping requirement imposed by the agency.

- Identify whether this is a request for approval of a New Collection, a Revision to an Existing Collection, an Extension, or a Reinstatement.
- If a form is not being used (i.e., no collection instrument accompanies this statement), list what information is being collected or disclosed, or the recordkeeping requirement imposed by the agency.
- If this request is related to a previously approved collection, please summarize any existing changes to instruments (e.g., forms, questions, instructions), method of collection, burden estimates, or other material changes of importance that have occurred since the last approval/request and provide a redline mark up or a table to show the questions and/or other information that the agency has changed.

The U. S. Small Business Administration (SBA), Office of Veterans Business Development (OVBD) is authorized to formulate, execute, and promote policies and programs that provide assistance to small business concerns owned and controlled by veterans and small business concerns owned and controlled by service-disabled veterans per section 32 of the Small Business Act.

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, among other things, “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.” As part of the Transition GPS Program, 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 2011 Congress passed the “VOW to Hire Heroes Act of 2011, Pub. L. 112-56 Title II, §§ 201-265, 125 Stat. 711, 713, which included steps to improve the existing Transition Assistance Program (renamed Transition GPS) for Service Members. Among other things, the VOW Act made participation in several components of Transition GPS mandatory for all service members.

This is an extension to the existing Boots to Business Post Course Surveys data collection.

1. Need & Method for the Information Collection. Explain the circumstances that make the collection of information necessary.
 - Identify any legal or administrative requirements that necessitate the collection.
 - Provide the citation and a copy of the appropriate section of each statute / regulation mandating or authorizing the collection of information as a supplementary document.
 - Explain what the statute/regulation requires. Is there a deadline? If so, explain how you will meet the deadline.
 - Describe how the information will be collected (e.g., written forms, telephone, online, electronically). Also, describe who will oversee the collection of information (e.g. independent evaluator, trained moderator, self-administered).
 - For each piece of information collection that is electronically not “fillable,” and/or “submittable,” explain why.
 - Consequences if collection is not conducted. Describe the consequence to a Federal program or policies if the collection is not conducted, or is conducted less frequently, and describe any technical or legal obstacles to reducing burden.

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

During transition, transitioning service members and their spouses may select the Entrepreneurship Career track two-day workshop. Veterans who have already transitioned may attend the Boots to Business Reboot two-day workshop which covers the same material as the traditional Boots to Business course.

2. Use of the Information. Indicate how, by whom, and for what purpose the information is to be used (e.g., program administration, application for benefits or services, regulatory compliance, inform policy development).
 - For program evaluations, research studies (including formative research), and surveys, describe the specific goals and purposes of the study as well as the specific research questions that the study will address. Describe whether this study will be used strictly as feedback for internal programmatic use only, or whether it will provide performance

measures for Congress or OMB, inform policy, inform agency rulemaking, or be published as an agency report or a report to Congress. Include a discussion of the strengths and weaknesses of the proposed design and its suitability for the intended uses.

- For an existing collection, describe the use (or principal uses if there are more than one) of the previously collected information, whether by the agency or by other entities.
- Address whether this information will be used by other federal agencies or not. If so, for what purposes? Are there any privacy concerns related to this information sharing? If so, how have these been addressed?

The online post course surveys will be deployed to all Boots to Business participants via email or an anonymous URL link upon course completion. This voluntary collection enables the program office to assess both the quality of the Boots to Business courses and outcomes achieved by participants after attending Boots to Business. The data will be used for overall program management, continuous improvement initiatives, and reporting outcomes to better serve veteran entrepreneurs. Information used for reporting will be done in the aggregate and will not include Personally Identifiable Information (PII).

3. Use of Information Technology. 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 post course surveys are online, web-based forms, permitting electronic responses, ultimately decreasing the burden on respondents. Respondents will receive a link to the surveys via email or an anonymous URL link upon course completion.

4. Non-duplication. Describe efforts to identify duplication.
 - Describe the steps taken to ensure that this information is not collected elsewhere and that it could not be otherwise obtained. If the information has already been collected by your agency, another federal agency, a component of state or local government, or other public or private non-governmental entity, explain whether your agency could obtain the information from these sources.
 - Describe specifically why any similar information that is already available cannot be used or modified to be used for the purposes described.
 - For program evaluations, surveys, and research studies, provide a brief review of literature on this topic and explain why the existing information is not sufficient to meet the current needs of the agency.

Currently, Boots to Business participants are surveyed via a hardcopy DOD Transition Assistance Program evaluation. Data is provided to SBA on a quarterly basis but does not focus on Boots to Business and does not capture the data needed to report effectively on the program. OVBD receives this data because the Boots to Business "Introduction to Entrepreneurship" course is an elective track available to transitioning service members within the DOD Transition GPS Program. In order to avoid duplication, the Transition GPS Program survey data will be used in conjunction with the data collected from the post course surveys to further confirm findings related to the quality of Boots to Business. The post course surveys avoid requesting the same information as the DOD Transition GPS Program class evaluation.

5. Burden on Small Business. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden. Did the agency consider any exemptions, alternate options, or partial or delayed compliance options for small businesses?

Some of the respondents to this information collection, particularly the outcome assessment portion, might be small business owners. However, the de minimis time commitment for responding to the survey will not have a significant economic impact on the approximately 4,000 estimated respondents.

6. Less Frequent Collection. 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.

The Office of Veterans Business Development is required to report outcomes of the program and the post course surveys will provide valuable data that will help satisfy this requirement. If this collection is not conducted and feedback from program participants is not solicited on course quality, SBA's ability to understand pain points and target areas for improvement would be impaired. The data collected from these surveys will assist OVBD to understand if the program office is achieving goals as outlined for the agency. Specifically, the Course Quality Survey allows OVBD to understand the effectiveness of the course, as well as strengths and areas for improvement as it relates to trainer and course quality. These data will support continuous course quality improvement. The Outcome Assessment helps OVBD understand the long-term impact of the program and how the program may support transitioning service members in their endeavor to start a small business. Understanding what program participants go on to do after completing the course and gathering information on the percentage of course participants who start a business aligns with the overarching goals of the agency.

7. Paperwork Reduction Act Guidelines. 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 reviewed and 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 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.

8. Consultation and Public Comments. 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.

- Did the agency receive any comments in response to the required Federal Register notice?
- Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. If the agency declined to make changes in response to particular comments, explain why. Specifically address comments received on cost and hour burden. Address whether any of the instruments were changed and how.
- Describe efforts to consult with persons outside of the agency, including but not limited to soliciting views on the availability of data, the 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. This could include public meetings, outreach to stakeholders, review panels, and advisory committees.
- 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.

To obtain views of persons outside the agency, a 60-day Federal Register Notice was published on November 19, 2021, at 83 FR 64986. No comments were received.

9. Gifts or Payment. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.
- Is the agency proposing to provide any incentive (monetary or non-monetary) to potential respondents to obtain their information or to encourage respondents to provide the requested information?
 - If yes, explain why it is appropriate for the agency to provide the proposed incentive (and the proposed amounts) and why it is necessary to obtain information of sufficient quality for the intended purposes, including citations to past practices for this or similar federally funded collections, and specific research to examine the effects of providing incentives for this or similar collections. Specify the amount of each proposed incentive and how the incentive will be provided to the respondent.
 - If the agency is proposing an experiment to examine the potential effects of incentives, describe the different experimental conditions, why they were chosen, and the minimum detectable effects between conditions.

None.

10. Privacy & Confidentiality. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.
- Provide the exact language of any statement(s) that will be read or provided to respondents that explain how their information will be handled and protected by the agency.
 - o If the agency is pledging to keep the information “confidential,” then provide the citation for the statute that the agency is using as the basis of its confidentiality pledge. Include the appropriate excerpt from the statute here or as a supplementary document. Note: if the statutory basis for assuring confidentiality does not exist, the term “confidentiality” cannot be used. Instead, the document should explain any procedures that will be in place to protect respondent data.
 - o If the Privacy Act applies, the agency should discuss how the data will be managed under the Privacy Act.
 - Are respondents required to submit proprietary trade secrets, or other confidential information? Explain the procedures that the agency will

implement to protect the information's confidentiality to the extent permitted by law.

- Will the agency collect any personally identifiable information? In general, "personally identifiable information" refers to information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal information that can be linked to a specific individual.
 - o Complete a privacy impact assessment in full compliance with 44 U.S.C. 3501 note § 208? If so, provide a link to the privacy impact assessment on the agency's website or explain why the agency has determined that making the privacy impact assessment publicly available is not practicable (see 208(b)(1)(B)(iii)).
 - o Collect any information that will be included in records that are subject to the Privacy Act of 1974 (5 U.S.C. § 552a)?
 - o Include a Privacy Act statement on the instrument(s) that clearly informs the individual regarding (OMB Circular A-108):
 - The agency's authority for the collection.
 - Whether providing the information is voluntary or mandatory.
 - The principal purpose(s) for which the information will be used.
 - The routine uses which may be made of the information.
 - Any effects on the individual of not providing certain information.
 - o Provide the URL link to the most recent version of the system of records notice (SORN) in the Federal Register and/or on the agency website. The agency should briefly describe how it has considered and addressed privacy issues pertaining to the collection. For example, explain how the agency is collecting only the minimum personally identifiable information that is necessary to accomplish a purpose required by statute, regulation, or executive order.
- Will the agency use information technology to collect, maintain, or disseminate information that is subject to the E-Government Act of 2002 (44 U.S.C. 3501 note)?

During the registration process for a Boots to Business course, registrants are asked to permit SBA to use their name and contact information for SBA surveys and information mailings as part of the Boots to Business alumni network. In addition, the Use of Information paragraph on the first page of the survey informs respondents that the information provided is protected to the extent permitted by law including the Privacy Act of 1974, as amended (5 U.S.C. 552a and the Freedom of Information Act (5 U.S.C. 552)). That section also outlines the purpose of the surveys, why SBA needs the information and how the information is maintained in the agency's system of records, specifically SBA 5 - "Business and Entrepreneurial Initiatives for

Small Businesses" and SBA 39 - "Veteran Programs Training and Counseling Records."

11. Sensitive Questions. Provide additional justification for any questions of a sensitive nature.
- Is the agency proposing any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, income, immigration status, or other matters that are commonly considered sensitive? (Note that the term "sensitive information" is distinct from the term "personally identifiable information," although information may fall into both categories.)
 - This justification should include the reasons why the agency considers the questions necessary and the specific uses to be made of the information.
 - Provide any instructions given to respondents as to why the agency is collecting the sensitive information, whether providing the information is voluntary or mandatory, and what consequences, if any, would result if respondents decide not to answer.
 - Explain what steps, if any, the agency is taking to obtain the consent of the respondents when collecting this information.

Information such as race, ethnicity, transition type, years of service and age range are requested so we may identify trends among veterans in various demographics who successfully started a business after completing a Boots to Business course. In addition, business information such as financing obtained, number of employees, legal entity, and official designations (i.e., HUB-Zone) is requested to further understand where veterans are finding success. All requests for information on the surveys are voluntary.

12. Burden Estimate. Provide estimates of the burden of the collection of information. The statement should:
- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than ten) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
 - If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
 - Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside

parties for information collection activities should not be included here. Instead, this cost should be included under 'Annual Cost to Federal Government'.

Based on past experience with the surveys, approximately 4,000 annual respondents are expected. The annual hour burden is determined to be 667 hours. The estimate is based upon participant data collected over the past three years, averaging ten minutes for completion. The 4,000 respondents will spend ten (10) minutes completing the surveys per year.

The average total annual cost burden to the expected number of respondents is \$12,372.85 based on the expected value of participant pay grades. The estimate is based on the average annual salary (\$38,594.05) of transitioning service members according to DOD and the ten (10) minutes required to complete the surveys.

Explain the reason for any changes to the burden and fill out the tables below (*or another table that explains the changes, as appropriate). These could involve one of the following.

- Changes Due to Adjustment in Agency Estimate: An "adjustment" to a burden estimate is made for two purposes: (1) when more (or fewer) individuals or entities respond to an information collection as a result of factors outside an agency's control (e.g., the number of respondents to a collection can increase or decrease due to changes in demographics or in the level of economic activity), or (2) when an agency re-estimates the amount of burden that a collection imposes (e.g., the agency develops an improved methodology for estimating the burden that a collection imposes). In either situation, the agency has not made any change to the collection itself, and thus there is simply an adjustment to a previously approved burden estimate.
- Program Change Due to New Statute: These changes in burden occur when new laws are enacted or regulations are promulgated that require agencies to collect new information. Please provide the title, and a brief description of the statute, along with the information collection requirement that the statute is imposing.
- Program Change Due to Agency Discretion: These occur when agencies decide to increase (or decrease) the burden that a collection imposes on the public (e.g., by reducing the number of questions on a survey), or when establishing a new collection, that is not explicitly required by law.
- Change Due to Lapse in OMB Approval: These changes in burden occur when OMB's approval of a collection expires without an agency discontinuing or renewing them (which results in a burden decrease), or when an expired collection is reinstated (which results in a burden increase). If, for example, a collection expires in one (1) year, overall burden during that year decreases by the burden total associated with the collection. If the collection is reinstated in the subsequent year,

overall burden during that subsequent year increases by the amount of the collection

	Requested	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Change Due to Potential Violation of the PRA	Previously Approved
Annual Number of Responses for this IC				4,000		
Annual IC Time Burden (Hour)				667		
Annual IC Cost Burden (Dollars)				\$12,372.85		

Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

- **Reporting:** Requests for information for transmission to the Federal Government, such as grant application forms, written report forms, telephone surveys, and electronic data collections.
- **Recordkeeping:** Requirements, which may involve compilation and maintenance of records, either alone or in conjunction with the reporting of information to the agency and/or some other person.
- **Third-party or public disclosure:** Requirements which may involve a requirement to disclose information to other members of the public directly or through publication in media such as newspapers or magazines, or to post the information on labels.

Burden per Response:

	Time Per Response	Hours	Cost Per Response
Reporting			
Record Keeping			
Third Party			

Disclosure			
Total			

Annual Burden:

	Annual Time Burden (Hours)	Annual Cost Burden (Dollars)
Reporting		
Record Keeping		
Third Party Disclosure		
Total		

Not applicable.

13. Estimated nonrecurring costs. 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 already reflected on the burden worksheet).

- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than ten), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide

information or keep records for the government, or (4) as part of customary and usual business or private practices.

Not applicable.

14. Estimated 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. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

There is minimal cost to the Federal Government as this form will be online where respondents will submit their information electronically.

15. Reasons for changes. Explain the reasons for any program changes or adjustments reported on the burden worksheet.

Based on the previous three years of data collection, the Office of Veterans Business Development has a better understand the average amount of respondents to the survey. Our current estimates reflect the approximate annual number of respondents, and is a more accurate representation of how many respondents are expected to complete the survey. This revision is an increase in hours and expense.

16. Publicizing Results. 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.

Not applicable.

17. OMB Not to Display Approval. If seeking approval to *not* display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Not applicable.

18. Exceptions to "Certification for Paperwork Reduction Submissions." Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

No Exceptions.

19. Surveys, Censuses, and Other Collections that Employ Statistical Methods. If this request includes surveys or censuses or uses statistical methods (such as sampling, imputation, or other statistical estimation techniques), a Part B supporting statement must be completed.

The respondents who will be selected for the post course surveys extends to all service members, veterans and dependents that have completed any of the Boots to Business courses (approximately 13,000 class attendees, annually). There is no sampling as all participants will receive the surveys after course completion. In addition, the method used to collect this information is an online survey that respondents will receive via email. The expected response rate is approximately 28% based on average data collection response rate for the past three years. The post course surveys are completely voluntary.

The surveys are sent out to program participants who agreed to share their contact information via email. The Course Quality Survey is administered immediately after the course has occurred, so most of the respondent population will be transitioning service members and spouses. The Outcome Assessment will be administered to program participants one (1) year after the course has occurred in which case the respondent population will be veterans who may have become small business owners. Each program participant will receive a maximum of two surveys per year. Data are collected and stored in an online survey platform.

Although the surveys are completely voluntary, email reminders will be sent to deal with issues of non-response. A maximum of two email reminders will be sent within the three-week period following the initial invitation. In addition, the value of the survey is communicated to participants throughout all the Boots to Business courses. The email sent to respondents was also modified from a text-based email to an HTML email to be more visually appealing and interesting to potential respondents.