

U.S. SMALL BUSINESS ADMINISTRATION
Generic Clearance for Formative Data Collections for Evaluation, Research, and Evidence-
Building
OMB Control Number, 3245-XXXX
Justification – Part A Supporting Statement

Overview of Information Collection:

This Information Collection Request establishes a new generic clearance to conduct formative studies that inform the U.S. Small Business Administration's (SBA) evaluation, research, and evidence-building activities. The SBA's formative studies will collect data using well-established methodologies, including but not limited to questionnaires and surveys, semi-structured small group discussions or focus groups, observation, interviews, and cognitive interviews and user testing. The populations to be studied include SBA grantees, program and potential program providers and participants, researchers, practitioners, and other stakeholder groups involved in SBA programs, experts in fields pertaining to SBA evaluation and research, or others involved in conducting SBA evaluation, research, or evidence-building projects. Data collection may occur in-person, online, or by telephone, video, or other audio technology.

Conducting formative evaluation, research, and evidence-building activities will help the SBA better understand emerging needs and issues, identify evidence gaps, and ensure that SBA leadership and program offices have current data and information to implement SBA programs and initiatives successfully. The data from formative studies will be used to improve internal decision-making and inform future studies but will not be highly systematic nor intended to be statistically representative. Findings from these formative studies will not be generalized to the broader population and are not intended to inform major decisions. Information from data collection efforts may be shared in design and method documents; process maps, journey maps, conceptual frameworks, and logic models; performance metrics; as background materials for technical workgroups, informational documents, technical assistance plans; and evaluation or research reports. Shared findings will describe the study methods and limitations regarding generalizability and intended use.

1. Need & Method for the Information Collection.

Advancing the Foundations for Evidence-Based Policymaking Act of 2018 (Evidence Act) call to use data to build evidence and inform program design, the SBA requests approval of the Generic Clearance for Formative Data Collections for Evaluation, Research, and Evidence-Building to allow the SBA to conduct a variety of formative data collections. The SBA intends to design and conduct evidence-building activities, including formative evaluations of existing programs, processes, and new initiatives; logic model development and testing; process or journey mapping; research syntheses; survey, questionnaire, and metric development; analysis; and foundational fact-finding through descriptive and exploratory studies.

The SBA anticipates undertaking various new evaluation, research, and evidence-building activities related to the priority questions identified in the Agency's Enterprise Learning Agenda, including equity, the design and delivery of SBA's contracting, capital, counseling, and disaster assistance programs, and technological modernization. Pursuant to Executive Orders 13985, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government, and 14058, Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government, the SBA continuously seeks to ensure that the Agency's programs are effective, designed and delivered in a manner all people can navigate, reach underserved communities, promote equitable delivery of services, and meet customers' needs. In accordance with the SBA's commitment to advancing equity, improving service delivery, and promoting trust, the information collected under this generic clearance is necessary to enable the Agency to gather customer and stakeholder feedback in a timely and efficient manner.

The SBA's formative studies will collect data using well-established methodologies, including but not limited to semi-structured small group discussions or focus groups, questionnaires and surveys, observation, interviews, and cognitive interviews and user testing (e.g., in-person, video, and audio collections). These data collections will allow for collaborative, ongoing, and actionable communications between the Agency and its customers and stakeholders and allow the SBA to identify the strengths and weaknesses of current programs, initiatives, and services. The efficient and timely formative collection efforts allow feedback to contribute directly to rapid cycle improvements of program management and the delivery of products and services. Conversely, the failure to engage in formative data collection limits the SBA's ability to build evidence and inform the development of future impact studies.

2. Use of the Information.

Under this generic clearance, the SBA plans to engage in a variety of formative and exploratory data collections with SBA grantees, program and potential program providers and participants, researchers, practitioners, and other stakeholders to fulfill the following goals:

- maintain a rigorous and relevant evaluation and research agenda,
- inform the development of SBA's future evidence-building activities,
- inform the delivery of targeted assistance and workflows related to program and grantee processes,
- inform the development and refinement of recordkeeping and communication systems,
- plan for the provision of programmatic or evidence-capacity-related training or technical assistance,

- obtain grantee or stakeholder input on the development or refinement of program logic models, evaluations, and performance measures, and
- test activities to strengthen programs in preparation for summative evaluations.

The SBA's formative studies will collect data using well-established methodologies, including but not limited to semi-structured small group discussions or focus groups, questionnaires and surveys, observation, interviews, and cognitive interviews and user testing (e.g., in-person, video, and audio collections). In accordance with OMB requirements, the SBA will submit information about individual information collection activities proposed under the generic clearance, including the data collection method, sampling strategy, a copy of the individual instruments or questionnaires, recruitment materials, protocols, and as appropriate, other supplementary materials describing the project. The SBA understands that OMB will make every effort to review materials for individual generic information collection requests within ten working days of submission. The SBA will make separate submissions for the clearance of full, non-formative data collection efforts and for data collections intended for statistical purposes as defined by 44 U.S. Code § 3561.

The data collected from formative studies will be used to improve internal decision-making and inform future studies but will not be highly systematic nor intended to be statistically representative. The data collection efforts are also not intended to produce influential information that is expected to have a genuinely clear and substantial impact on major policy decisions. Information gathered may inform future evaluation, research, and evidence-building, which could inform future influential public policy decisions.

Data collected under this generic clearance are not intended for use by other Federal agencies. However, the collected data may be shared with other Federal agencies where an evidence-building Interagency Agreement (IAA) exists, given that the data shared is for a specific program covered by the IAA. The study methods, limitations regarding generalizability, and intended use will be described in any produced work product.

Information from data collection efforts may be shared in design and method documents; process maps, journey maps, conceptual frameworks, and logic models; performance metrics; as background materials for technical workgroups, informational presentations, technical assistance plans; and evaluation or research reports. The aggregated results of formative work may also be prepared for presentation at professional meetings, professional journals, or an agency report or report to Congress. However, findings from these formative studies will not be generalized to the broader population and are not intended to inform major decisions. Additionally, shared findings will describe the study methods and limitations regarding generalizability and intended use. When necessary, the results will be labeled as formative or exploratory.

3. Use of Information Technology.

The SBA and its contractors will collect information electronically and/or use online collaboration tools, as appropriate, to reduce the burden. Specific information regarding the use of technology will be submitted with each generic ICR.

4. Non-duplication.

The purpose of this clearance is to inform SBA's decision-making related to evidence-building and programmatic activities. To the maximum extent possible, the SBA will use existing data sources before seeking clearance under this generic ICR, and the data collected through the formative studies approved under this generic clearance will not duplicate data collected elsewhere or otherwise obtainable. Without this generic ICR, information gathering would not be feasible due to the time constraints of seeking clearance for each individual data collection.

5. Burden on Small Business.

The SBA was created to help small business owners and entrepreneurs start, build, and grow businesses, and assisting and protecting the interests of small business concerns is central to the Agency's mission. Given the Agency's purpose, the data collection efforts under this generic clearance will frequently involve small businesses or other small entities. To minimize the burden of information collections approved under this clearance, the SBA will use sampling techniques, ask for readily available information, and use short, easy-to-complete information collection instruments when possible.

6. Less Frequent Collection.

The SBA anticipates that all data information collected under this generic clearance will involve a one-time data collection. However, if a data collection effort involved a more frequent collection, the rationale and detail will be provided in the individual information collection request. Without the collection of formative data under this ICR, the Agency's ability to solicit feedback from a broad and diverse stakeholder base will be limited, impacting our ability to identify the strengths and weaknesses of current programs, initiatives, and services and engage in rapid cycle improvements of program management and the delivery of products and services.

7. Paperwork Reduction Act Guidelines.

There are no special circumstances. The information collected will be voluntary and will not be generalizable. Further, the information collected will not be labeled as statistical activities or used for statistical purposes as defined by 44 U.S. Code § 3561.

8. Consultation and Public Comments.

Per 5 CFR 1320.8(d), a 60-day notice for public comment was published in the Federal Register on January 13, 2022 [87 FR 2204 - Generic Clearance

for Formative Data Collections for Evaluation, Research, and Evidence-Building (FR Doc. 2022-00564)]. No comments were received.

The SBA did consult with other federal agencies engaging in formative data collections using a generic information clearance. Additionally, consultation with SBA staff and contractors engaging in formative evaluation, research, and other evidence-building activities will occur when preparing the individual data collections submitted under this ICR.

9. Gifts or Payment.

Small businesses and small businesses in underserved communities are the populations of interest in most of SBA's planned formative data collections, and incentives can be an effective way to improve response rates and are appropriate when non-participation jeopardizes the quality of the survey data or in studies that pose a burden to specialized respondents, rare groups, or minority populations.¹ Although the SBA does not intend to use incentives with every ICR requested under this generic clearance, the SBA may provide nominal monetary or non-monetary incentives with standard values ranging from \$10 for online surveys to \$75 for in-person, multi-hour cognitive testing, user testing, or focus group data collection effort. The detail will be provided in the individual information collection request if an incentive is proposed. Additionally, when information collections include disenfranchised and hard-to-reach groups, the Agency may opt to offer a non-standard value incentive. Any non-standard value requests will provide additional justification based on the type of collection, the population of respondents, and other circumstances.

10. Privacy & Confidentiality.

The SBA does not anticipate that the Privacy Act will apply to any data collection under this generic ICR. If the Privacy Act does apply to a collection, the SBA will provide a Privacy Act statement, SORN, or other associated documentation, as appropriate. Participation in any formative data collection effort will be voluntary, and personally identifiable information will only be collected to the extent necessary. Respondents will be informed of all planned data uses, that their participation is voluntary, and that their information will be kept private to the extent permitted by law. All data collection shall protect respondent privacy to the extent permitted by law and will comply with all Federal and Agency regulations for private information.

¹ Office of Information and Regulatory Affairs Office of Management and Budget (updated 2016) Questions and Answers when Designing Surveys for Information Collections available at [questions and answers when designing survey \(archives.gov\)](https://www.archives.gov/foia/questions-and-answers-when-designing-survey)

If a confidentiality pledge is deemed necessary, the Agency will only include a pledge of confidentiality supported by authority established in statute or regulation, supported by disclosure and data security policies that are consistent with the pledge. Any such pledge does not unnecessarily impede sharing of data with other agencies for compatible confidential use. The term confidentiality will not be used when no statutory basis exists, and instead, the process to protect respondent data and anonymity will be explained. A voluntary and informed consent statement will be submitted with each request when appropriate based on the data collection effort. Finally, information will not be maintained in a paper or electronic system from which they are directly queried by an individuals' personal identifier.

11. Sensitive Questions.

Data collection requests may ask for demographic and socio-economic information, which can be considered sensitive. However, all responses are voluntary, and the majority of questions included in SBA's formative data collection efforts will not be sensitive in nature. If an individual data collection effort includes potentially sensitive questions beyond demographic and socio-economic information, an additional explanation will be provided in the individual clearance request.

12. Burden Estimate.

Various data collection techniques and instruments will be used to conduct evidence-building activities under this clearance. However, the exact number of respondents and data collection instruments are not known at this time. The estimated burden for this new generic clearance for formative data collections considers the SBA's Enterprise Learning Agenda evidence needs. The calculations are based on previous experience with formative data collection efforts and consultation with evaluation and research contractors with whom the SBA partnered. Based on previous experience and projections of projects to be conducted over the next three years, 832.5 annual burden hours are estimated with the annual respondent cost of \$23,318. Respondent cost estimates are based on the Bureau of Labor Statistics May 2021 median wage for all occupations of \$28.01 per hour. No additional cost burdens to respondents for reporting, recordkeepers, or third-party disclosures are anticipated. The estimated number of respondents also assumes a 20% response rate with 4,500 individuals invited to participate in the data collections.

Annual Burden Estimate:

Description of Data Collection Method	Estimated Number of Respondents	Frequency of Response	Estimated Annual Responses	Estimated Average Minutes/Response	Estimated Annual Hour Burden	Estimated Annual Cost
Small group	240	1	240	90	360	\$10,084

discussions or focus groups						
Surveys or questionnaires	450	1	450	30	225	\$6,302
Interviews	135	1	135	60	135	\$3,781
Cognitive interviews or user testing	75	1	75	90	112.5	\$3,151
<i>Total</i>	<i>900</i>		<i>900</i>		<i>832.5</i>	<i>\$23,318</i>

13. Estimated nonrecurring costs.

No additional costs are anticipated.

14. Estimated cost to the Government.

Based on previous experience and projections of projects to be conducted over the next three years, the anticipated cost to the Federal Government is approximately \$249,590 annually. The estimated costs consider Agency staff time, contractor payments, and any other necessary expense to collect the information approved under this generic clearance. Contractor and other expense costs will be covered by the data collection budgets from each individual evaluation, research, or evidence building project, and the costs will be fully described in individual ICR.

15. Reasons for changes.

The Generic Clearance for Formative Data Collections for Evaluation, Research, and Evidence-Building is a new ICR, and the burden estimates above are consistent with those published in the January 13, 2022, Federal Register Notice 60-day notice of information collection and request for comments.

16. Publicizing Results.

The primary purpose of data collected under this generic ICR is not for publication. However, because the formative data collection efforts are intended to inform SBA's decision-making related to evidence-building and programmatic activities, the findings may be incorporated into documents and presentations available to the public. Such documents may include design and method documents; process or journey maps, conceptual frameworks, or logic models; performance metrics; background materials for technical workgroups, informational presentations, technical assistance plans; and evaluation or research reports. Although not anticipated, the SBA may receive requests to release the information (e.g., congressional inquiry, Freedom of Information Act requests) and will disseminate the findings when appropriate, following the Agency's guidelines. Shared findings will include a discussion of the limitations regarding generalizability and intended use, and when necessary, results will be labeled as formative or exploratory.

17. OMB Not to Display Approval.

All instruments submitted under this ICR will display the expiration date for OMB approval.

18. Exceptions to "Certification for Paperwork Reduction Submissions."

No exceptions are requested, and these activities proposed under this ICR request comply with the requirements in 5 CFR 1320.9.

19. Surveys, Censuses, and Other Collections that Employ Statistical Methods.

Data collection requests under this generic ICR are not intended for statistical purposes as defined by 44 U.S. Code § 3561. Additionally, each formative data collection effort is expected to use a unique instrument, which will be submitted with the individual ICR request. All sampling methods used with requests made under this ICR are to gain insight from a broad and diverse set of stakeholders while simultaneously minimizing the burden, not intended to make inferences about a population.