

DEPARTMENT OF TRANSPORTATION

SUPPORTING STATEMENT

Counseling Information Form; Regional Center Intake Form and Quarterly (formerly Monthly) Report of Operations Form.

OMB Control Number: 2105-0554

INTRODUCTION

This is to request the Office of Management and Budget's (OMB) renewed three-year approved clearance for the information collection entitled, **Counseling Information Form; Regional Center Intake Form and Quarterly Report of Operations.**

Part A. Justification

1. Circumstances that make the collection of information necessary. EXPLAIN THE CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY. IDENTIFY ANY LEGAL OR ADMINISTRATIVE REQUIREMENTS THAT NECESSITATE THE COLLECTION. ATTACH A COPY OF THE APPROPRIATE SECTION OF EACH STATUTE AND REGULATION MANDATING OR AUTHORIZING THE COLLECTION OF INFORMATION.

In accordance with (P.L. 95-507), an amendment to the Small Business Act and Small Business Investment Act of 1953, the Department of Transportation's (DOT) Office of Small and Disadvantaged Utilization (OSDBU) is responsible for the implementation and execution of DOT activities on behalf of small businesses, in accordance with Section 8, 15 and 31 of the Small Business Act (SBA), as amended. The Office of Small and Disadvantaged Business Utilization also administers the provisions of Title 49, of the United States Code, Section 332, the Minority Resource Center (MRC) which includes the duties of advocacy, outreach, and financial services on behalf of small and disadvantaged businesses and those certified under CFR 49 parts 23 and or 26 as Disadvantaged Business Enterprises (DBE). The cumulative data collected will be analyzed by the OSDBU to determine the effectiveness in assisting small businesses to enhance their opportunities to participate in DOT contracts and subcontracts.

2. How, by whom, and for what purpose the information is to be used. INDICATE HOW, BY WHOM, AND FOR WHAT PURPOSE THE INFORMATION IS TO BE USED. EXCEPT FOR A NEW COLLECTION, INDICATE THE ACTUAL USE THE AGENCY HAS MADE OF THE INFORMATION RECEIVED FROM THE CURRENT COLLECTION.

SBTRC's Regional Field Offices will collect information on small businesses, which includes Disadvantaged Business Enterprise (DBE), Women-Owned Small Business (WOB), Small Disadvantaged Business (SDB), 8(a), Service Disabled Veteran Owned Business (SDVOB), Veteran Owned Small Business (VOSB), HubZone, and types of services they seek from the Regional Field Offices. Services and responsibilities of the Field Offices include areas such as; business analysis, general management & technical assistance, training, business counseling, outreach services/conference participation, short-term lending. Also, businesses are able to participate in the Bonding Education Program. The cumulative data collected will be analyzed by the OSDBU to determine the effectiveness of services provided. Such data will also be

analyzed by the OSDBU to determine agency effectiveness in assisting small businesses to enhance their opportunities to participate in government contracts and subcontracts.

3. Extent of automated information collection. 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 Regional Field Offices Intake Form, (DOT F 4500) is used to enroll small business clients into the program in order to create a viable database of firms that can participate in government contracts and subcontracts, especially those projects that are transportation related. Each area on the fillable pdf form must be filled in electronically by the Field Offices and submitted every quarter to OSDBU

The collection of such information involves the use of electronic submission by the Regional Centers as a means of reducing costs and increasing efficiency. In addition, each enrolled small business will be assigned a client number that can track the firm's involvement in the services offered by the SBTRCs. Each area on the form must be filled in electronically by the SBTRCs and retained in secured files of the client.

4. Describe efforts to identify duplication. DESCRIBE EFFORTS TO IDENTIFY DUPLICATION. SHOW SPECIFICALLY WHY ANY SIMILAR INFORMATION ALREADY AVAILABLE CANNOT BE USED OR MODIFIED FOR USE FOR THE PURPOSES DESCRIBED IN ITEM 2 ABOVE.

The Office of Small and Disadvantaged Business Utilization has a reporting system that is unique to DOT for evaluating the effectiveness of the program in providing assistance to the small businesses in each region. Information is collected and transmitted to OSDBU electronically on a quarterly basis or on an as-needed basis for quick decision making. Our on-line reporting system enhances the information collection process and provides OSDBU with a more accurate and efficient basis for offering improved services to small, women-owned and DBE firms in their efforts to obtain transportation-related government contracts and subcontracts.

5. Efforts to minimize the burden on small businesses. IF THE COLLECTION OF INFORMATION IMPACTS SMALL BUSINESSES OR OTHER SMALL ENTITIES, DESCRIBE ANY METHODS USED TO MINIMIZE BURDEN.

Collection of information will not have a significant economic impact on a substantial number of small entities because the Regional Field Offices must complete only one Intake Form (DOT F

4500) per each small business person who seeks assistance from the Field Office. Each company will have a Client number that indexes their application and avoids the need to create duplicate Intake Forms. In addition, there is a report due each quarter (a total of 4 per year) from the Field Office which highlights the services provided to small businesses enrolled in the program. All transactions are converted to fillable pdf forms to facilitate the storage and retrieval of information as required.

6. Impact of less frequent collection of information. 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.

Failure to allow collection of requested data would thwart the efforts of the Office of Small and Disadvantaged Business Utilization in providing assistance to small businesses which are in need of services such as outreach marketing, training and technical assistance and financial assistance. OSDBU works closely with recipients of DOT funds (primarily state DOTs, Transit Authorities, Rail, and Airports) to ensure that small businesses have an equitable opportunity to participate in DOT funded contracts and subcontracts. If OSDBU is denied this requested information, the agency may breach its duty owed to Small Business Administration under “Reciprocal Procedures for Expediting the Certification Requirements of SBA regulations (13 C.F.R. part 124) and DOT regulations (49 C.F.R. parts 23 and 26),” that create opportunities for converting the forms to a computerized form to make their completion and revision more efficient and to facilitate the storage and retrieval of the data they contain, thus increasing the participation of small, women-owned and DBEs in prime contracting and subcontracting opportunities at DOT.

7. Special Circumstances. EXPLAIN ANY SPECIAL CIRCUMSTANCES THAT WOULD CAUSE AN INFORMATION COLLECTION TO BE CONDUCTED IN A MANNER:

These collections are consistent with the guidelines in 5 CFR 1320.6.

8. Compliance with 5 CFR 1320.8(d). IF APPLICABLE, 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. SUMMARIZE PUBLIC COMMENTS RECEIVED IN RESPONSE TO THAT NOTICE AND DESCRIBE ACTIONS TAKEN BY THE AGENCY IN RESPONSE TO THOSE COMMENTS. SPECIFICALLY ADDRESS COMMENTS RECEIVED ON COST AND HOUR BURDEN.

DESCRIBE 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.

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.

A notice (copy attached), pursuant to 5 CFR 1320.8(d), soliciting comments on the proposed approval of the information collection on Tuesday, February 7, 2023, [FR Vol. 88, Page 8037]. No comments were received.

9. Payment or gifts to respondents. EXPLAIN ANY DECISION TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS, OTHER THAN REMUNERATION OF CONTRACTORS OR GRANTEEES.

No payments or gifts are provided to respondents.

10. Assurance of confidentiality. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS AND THE BASIS FOR THE ASSURANCE IN STATUTE, REGULATION, OR AGENCY POLICY.

If an applicant desires that any information submitted in its application or any supplementary material not be released by the Department upon request from a member of the public or otherwise made publicly available, the applicant is directed to state so and directed to provide reasons why such information is confidential and should not be released, including particulars as to any competitive harm which would potentially result from the release of such information. The Department will handle requests from the public for release of information under its standard Freedom of Information Act procedures.

11. Justification for collection of sensitive information. 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. THIS JUSTIFICATION SHOULD INCLUDE THE REASONS WHY THE AGENCY CONSIDERS THE QUESTIONS NECESSARY, THE SPECIFIC USES TO BE MADE OF THE INFORMATION, THE EXPLANATION TO BE GIVEN TO PERSONS FROM WHOM THE INFORMATION IS REQUESTED, AND ANY STEPS TO BE TAKEN TO OBTAIN THEIR CONSENT.

There are no questions of a sensitive nature, such as those areas identified above.

12. Estimate of burden hours for information requested. PROVIDE ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION. THE STATEMENT SHOULD:

Number of annual respondents:

- SBTRC Regional Field Offices Intake Form (DOT F 4500)
Estimated total Annual Burden on Respondents: 150 hours per year

Explanation of how the burden was estimated:

SBTRC Regional Field Offices Intake Form (DOT F 4500)

Estimated Total Annual Burden on Respondents: 150 hours per year.

- 100 respondents x 90 minutes to complete the intake form hours = 9,000
- 9,000 divided by 60 minutes = 150 hours of estimated annual burden on respondents

The burden was decreased with streamlining of questions on the intake form.

13. Estimate of the total annual costs burden. PROVIDE AN ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS OR RECORDKEEPERS RESULTING FROM THE COLLECTION OF INFORMATION. (DO NOT INCLUDE THE COSTS OF ANY HOUR BURDEN SHOWN IN ITEMS 12 AND 14).

- (a) Total capital/start-up costs: None
- (b) Total operation and maintenance: None

People filling out the Regional Field Offices Intake Form (DOT F 4500) are paid with grant money from the Federal Government, so the participant are not spending any money of their own preparing and submitting reports.

The burden should extend no further than collecting already existing material, and putting it in a form appropriate for filing with the Department and with OSDBU.

14. Estimates of costs to the Federal Government. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT. ALSO, PROVIDE A DESCRIPTION OF THE METHOD USED TO ESTIMATE COSTS, 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 ALSO MAY AGGREGATE COST ESTIMATES FROM ITEMS 12, 13, AND 14 IN A SINGLE TABLE.

The cost for 176 hours of a GS-13 Federal Employee is \$ 9,445.92.

15. Explanation of the program change or adjustments. EXPLAIN THE REASONS FOR ANY PROGRAM CHANGES OR ADJUSTMENTS REPORTED IN ITEMS 13 OR 14.

Participants are no longer required to submit monthly reports, therefore DOT F 4502 is not used anymore. We now require only one form which is "SBTRC Regional Field Offices Intake Form" (DOT F 4500). Switching from monthly information collection to quarterly is the reason behind drop in burden hours.

16. Publication of results of data collection. 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. Approval for not displaying the expiration date of OMB 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.

Expiration dates should be displayed.

18. Exceptions to the certification statement. EXPLAIN EACH EXCEPTION TO THE CERTIFICATION STATEMENT "CERTIFICATION FOR PAPERWORK REDUCTION ACT SUBMISSIONS."

Not Applicable.

Part B. Collections of Information Employing Statistical Methods.

Not Applicable.