

U.S. Small Business Administration
Small Business Week Award Nominations
OMB Control Number, 3245-0360
Justification – SBA Award Forms 3300-3315

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

The SBA collects nomination forms to include SBA form #3300 - used to identify an actual or apparent conflict of interest, to verify the accuracy of the information submitted with the nomination packages, and to apply defined evaluation criteria to each nominee's background to determine whether a nominee is eligible for a recognition award.

All nominees must be cleared by the U.S. Small Business Administration's Office of Diversity, Inclusion & Civil Rights (formerly the Office of Equal Employment Opportunity) and Office of Inspector General. These clearances are required to help verify the accuracy of the nomination packet and to preclude any potential conflict of interest or embarrassment to the nominee, the U.S. Government or the President of the United States. Once a nominee is cleared, the information collected is reviewed by a panel of SBA and non-SBA judges that evaluates nominees to determine whether they meet the evaluation criteria outlined in the Awards Nomination Guidelines (2023 guidelines attached)

The information collected on forms #3301-3315, inclusive, will be used to evaluate the nominations and select the winners based on the criteria outlined in the nomination guidelines.

- **Identify whether this is a request for approval of a New Collection, a Revision to an Existing Collection, an Extension, or a Reinstatement.**

Extension of the collection of forms (expiration November 2023)

- **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.**

N/A

- **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.

Forms 3300-3314 (3313 is obsolete as award category is no longer available) and awards guidelines are substantively the same as in previous years. In addition to miscellaneous minor grammatical/language edits, questions on certain forms were modified as follows:

- 3301-Small Business Person of the Week Award and 3302-Small Business Exporter of the Year Award
 - The financial summary data requirement is for the previous (3) years. We will update this section where the public fills in the data to 2020, 2021 and 2022. For the year 2023 the years 2019, 2020 and 2021 were used.
 - On those same two forms, we are adding a clarifying instructional comment “Refer to question #15 for problems faced, including COVID-19 related issues.” The reason we are adding this is so that businesses who had a downturn during COVID will know they can explain further in question #15, which is the place where they can address their response to adversity.
- 3303-Phoenix Award for Small Business Disaster Recovery
 - Optional question added. The purpose is to allow respondents that received SBA disaster mitigation assistance the opportunity to provide that detail, which was not included on the original form.
- 3313-Jody Raskind Lender of the Year Award
 - This form and the award are no longer available as award category is no longer available.

1. Need & Method for the Information Collection. Explain the circumstances that make the collection of information necessary.

Section 8(b)(1)(A)(iv) of the Small Business Act, 15 U.S.C. 637(b) (1)(A)(iv), and § 132(a) of Pub. L. 108-447, as continued by the Consolidated Appropriations Act, 2017, Pub. L. 115-31, authorize the Administrator of the U.S. Small Business Administration (SBA) to recognize achievements of small businesses through appropriate events and activities. (Copies of these provisions are attached). In recognition of the small business community's

contributions to the nation's economy and society, the President of the United States designates one week each year as Small Business Week. Leading up to that week, the U.S. Small Business Administration seeks nominations for various recognition awards honoring the nation's small business owners and entrepreneurs, small business advocates, and small businesses. Recognition awards are presented by SBA to winners at the district, regional and national levels. Potential award recipients are nominated by banks, SCORE, Women's Business Centers, Small Business Development Centers, employees, spouses or self-nomination. This information collection, *Small Business Administration Award Nomination Form*, and other information set out in the Awards Nominations Guidelines is used to facilitate the award selection process.

The information collected is required to determine whether an award nominee has an actual or apparent conflict of interest. The information is also used to evaluate the nominations and select the winners based on the criteria outlined in the nomination guidelines. If the information is not provided, the Agency would be unable to vet or evaluate the nominees. In addition, a credible recognition awards program would not be possible and the SBA would be hampered in its efforts to recognize outstanding small businesses. In order to keep award form documents and PII confidential, SBA utilizes Box.com. Nomination forms and documents are collected through SBA district and program office Box accounts.

A respondent may be required to respond to the request for the collection of information on Form 3300 in less than thirty days only if the person who nominates the respondent nominates the respondent within the thirty days prior to the due date for the completed nomination packet for the particular recognition award.

Confidential financial or personal information is requested but the Agency can demonstrate that it will protect the confidentiality of the information to the extent permitted by the law. The information collected is also shared through Box.com.

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).**

The general public has the option to submit nominations via Box (a cloud-based file storage and file sharing service that provides individuals and businesses easy-to-use cloud storage solutions and collaboration tools) to SBA field offices and program offices. The SBA will use the nomination packages to select National Small Business Week winners on the state, district, regional or national levels.

The information collected on Form 3300 is used to identify an actual or apparent conflict of interest, to verify the accuracy of the information submitted with the nomination packets, and to apply defined evaluation criteria to each nominee's background to determine whether a nominee is eligible for a recognition award.

- 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 guidelines for eligibility and submission of information, as well as Forms 3300-3315 are available online at the agency website.

- 4. Non-duplication. Describe efforts to identify duplication.**

Those award nominees who have applied for, or received SBA assistance may have previously provided some of the information requested. However, because applications for SBA assistance are not centrally located, it is not always possible to readily match up any prior particular collection of information. In addition, it is important to obtain information that is as current as possible. SBA minimizes the burden by requesting only the minimal information necessary to make informed selections.

- 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?**

The only small businesses impacted by the collection of this information are those owned or operated by the award nominees. This information collection will not have a significant economic impact on the approximately 500 who respond to this collection of information. In any event, the information requested should be readily available from the nominees' personal and business records.

- 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 information collected is required to determine whether an award nominee has an actual or apparent conflict of interest. The information is also used to evaluate the nominations and select the winners based on the criteria outlined in the nomination guidelines. If the information is not provided, the Agency would be unable to vet or evaluate the nominees. In addition, a credible recognition awards program would not be possible and the SBA would be hampered in its efforts to recognize outstanding small businesses.

7. Paperwork Reduction Act Guidelines. Explain any special circumstances that would cause an information collection to be conducted in a manner:

Not applicable

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.

A request for public comment was published in the Federal Register at 87 FR 33282 on June 1, 2022. The comment period ended on August 1, 2022; 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.

No payment or gift will be provided to respondents for completing this information collection. However, award winners will receive some tangible item of nominal value, such as a trophy, plaque, or award certificate to commemorate their achievements.

10. Privacy & Confidentiality. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Authority: 15 U.S.C. 634(b)(6), 44 U.S.C. 3101. SBA informs nominees that their information will be protected to the extent permitted by law, including the Freedom of Information Act, 5 U.S.C. 552, and the Privacy Act, 5 U.S.C. 552a. This information is hosted on SBA Infrastructure Services via Box.com. For the purposes of information, form #3300 collects data fields that are personal identifiable information (PII) that includes name, address, telephone number, date of birth and email address. This information is hosted on SBA Infrastructure Services via Box.com and details are found on the respective Privacy Impact Assessment. The system of record notice that is affiliated with this is SBA 28. The privacy and confidentiality of this collection is in compliance with federal laws, SBA's Cybersecurity and Privacy Policy,

industry best practices and standards for security and privacy, routine security and privacy controls assessment, authority to operate, and end user's Cybersecurity and Privacy annual mandatory training.

11. Sensitive Questions. Provide additional justification for any questions of a sensitive nature.

Some of the information collected can be perceived as sensitive, which includes criminal history, citizenship, and date of birth. SBA protects the information to the extent permitted by law. The agency has a Privacy Act System of Records, SBA 28 -- Small Business Person and Advocate Awards, 74 FR 14889, that covers the safeguarding of PII to include information listed above in #10. The authority of this collection complies with Authority: 15 U.S.C. 634(b)(6), 44 U.S.C. 3101 and the provisions of the Privacy Act of 1974 as amended.

12. Burden Estimate. Provide estimates of the burden of the collection of information.

Each year, approximately 500 award nominees respond to this information collection as part of the annual recognition award program process. Each nominee submits Form 3300 regardless of the award, as well as the specific form that relates to the nominated award (i.e. from the 3301-3315 series of forms).

Respondents will spend an estimated average of 90 minutes responding to the information collection, including reading the questions, locating specific information in their business or personal files and answering the questions. The burden for Form 3300 is 15 minutes and for each of the forms 3301-3315 (less #3313) the burden is 75 minutes.

Generally, an administrative assistant, loan officer, Small Business Development Center personnel or the nominee will collect and submit the information. SBA estimates that the wage level of such personnel is equivalent to the average wage for a GS-9 employee.

As such the estimated hour cost burden is as follows:

Average hourly wage for person completing collection: \$31.12

Total cost per response: $\$31.12 \times 1.5 \text{ hours} = \46.68

Total estimated cost burden: $500 \times \$46.48 = \$23,240$

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).

Not applicable

- 14. Estimated cost to the 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.**

The cost to the Federal Government for handling this information collection is negligible. SBA employees will review the forms and manage the entire nomination and selection process as part of their regularly assigned duties.

SBA estimates that the wage level of such personnel is equivalent to the average wage for a GS-13 employee.

As such the estimated hour cost burden is as follows:

Average hourly wage for person completing collection: \$44.56

Total cost per review processing: \$22.28

Total estimated cost burden: \$746.38

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

Estimated number of respondents and burden hours has not changed.

- 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.**

Winners receive extensive local media coverage. Biographical and relevant business information pertaining to the winners will be provided to the media upon request.

The estimated project schedule for the 2024 Small Business Week award program is as follows:

Nominations will be submitted to the appropriate district or program office BOX link in the nominee's state or district by a deadline of December 7, 2023.

March 18, 2023: State winners will be announced.

State and District winners will be honored some time during calendar year 2024 on dates to be determined by the state or district offices, usually the week following NSBW.

May 5 - May 11, 2024: National winners will be announced and honored at the Small Business Week celebration.

The timeline for subsequent years will be similar, with national awards being presented in May during National Small Business Week.

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."**

Not applicable

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.**

Not applicable. Statistical methods will not be employed to analyze the information collected or to determine award winners.