Request for Approval under the "Generic Clearance for Formative Data Collections for Evaluation, Research, and Evidence-Building"
(OMB Control Number: 3245-0425)

TITLE OF INFORMATION COLLECTION: CDFI and MDI Lender Participation in SBA Capital Programs Lender Interviews

PURPOSE OF THE COLLECTION:

This data collection effort is part of the Community Development Financial Institution and Minority Depository Institution Lender Participation in U.S. Small Business Administration (SBA) Capital Programs evaluation. The SBA's goal to increase capital access to underserved and minority-owned small businesses requires a deeper examination of the attractors, facilitators, and barriers that influence lenders' participation. This evaluation focuses on Community Development Financial Institutions (CDFIs) and Minority Depository Institutions (MDIs) participation in the 7(a) program, 7(a) Community Advantage program, Microloan program, and 504 Certified Development Company program and the Lender Match tool. The interviews in this data collection request will probe deeper into the CDFI and MDI Participation in SBA Capital Programs Lender Survey findings by building on the survey identified attractors, facilitators, and barriers to better understand the context, the how and why, behind the survey findings. The evaluation findings will enhance the SBA's understanding of why some CDFIs and MDIs participate in the SBA programs, but others do not. The findings will also be used to inform the delivery of targeted assistance and improve internal decision-making.

TYPE OF COLLECTION ACTIVITY: (Check one)

[ ] Survey/ questionnaire   [ ] Cognitive interview
[ ] Focus group/small group discussion   [ ] User testing
[X] Interviews   [ ] Observation/field study
                                                   [ ] Other: _____

CERTIFICATION:

I certify the following to be true:

1. The collections are voluntary.
2. The collection is low-burden for respondents and low-cost for the Federal Government.
3. The collections are non-controversial and do not raise issues of concern to other Federal agencies.
4. The collection is targeted to the solicitation of opinions from respondents who have experience with the program or may have experience with the program in the near future.
5. Personally identifiable information (PII) is collected only to the extent necessary and is not retained.
6. Information gathered is intended to be used for general service improvement and program management purposes.
7. Summaries and aggregate results may be included in public-facing evaluation or similar report.
8. Information gathered will not be used for the purpose of substantially informing influential policy decisions.

Name: Katherine Aaby
Title: Associate Administrator, OPPCFO

All instruments used to collect information must include:
OMB Control No. 3245-0425
Expiration Date: 10/31/2025

DESCRIPTION OF THIS SPECIFIC COLLECTION
To assist review, please provide answers to the following question:

1.   **Administration of the Instrument**
        a. How will you collect the information? (Check all that apply)
        [ ] Web-based or other forms of Social Media
        [X] Telephone or other audio technology
        [ ] Video
        [ ] In-person
        [ ] Mail
        [ ] Other ____

        b. Will interviewers or facilitators be used? [X] Yes [ ] No

2. Description of respondents/participants

The interviews cover current and potential lenders from CDFI and/or MDI organizations. A list of approximately 1,700 CDFI and MDI lender organizations was developed using the list of current SBA lenders and publicly available information from the CDFI Fund, FDIC, and NCUA. Where the point of contact information is missing from the source, web lookups were used to identify contact information.

A total of 108 current and potential CDFI and MDI lenders will be interviewed. Lenders will be purposively sampled to obtain a diverse mix of lender types (Federally Regulated CDFIs, Non-Federally Regulated CDFIs, and MDIs), lender status (active, new, and potential), and geographic/regional diversity.

3. Activity timeframe

Interview data collection will occur in the Summer of 2023.

4. Collection procedures
The interview script was developed based on detailed feedback from subject matter experts and SBA staff. Information about the most frequently mentioned attractors, facilitators, and barriers from the survey of lenders will be inputted after the survey is fully analyzed.

The interview script was cognitively pretested with six respondents. The pretesting took, on average, 30 minutes to complete. Time after the interview was used to solicit feedback resulting in rewording and reordering questions for improved clarity and reduced cognitive load.

The virtual interview data collection process will use the following materials:
- An official SBA introduction e-mail.
- A recruitment e-mail with the schedule template.
- A meeting invite email.
- Up to four reminder emails (two per week) to schedule an interview.
- Up to four reminder phone calls to schedule an interview.
- The web-based consent form.
- Semi-structured interviews will be conducted using an interview guide.

Prior to the virtual interviews, Optimal will email the lender the web-based consent form that includes a description of the data confidentiality disclosure. With permission from these lenders, we will record the audio of these interviews for the subsequent qualitative coding and analyses. Optimal staff members will be present during the interviews to help with organization, to take detailed notes, to manage the recording, and to facilitate some aspects of the discussion.

5. **Provide the question list (Submit all instruments, instructions, and scripts with this request).**

The data collection instruments, instructions, reminders and scripts are provided in an attachment and include the introduction, recruitment, and reminder emails, consent form, phone script, and an interview guide.

6. Use and dissemination of the results
The SBA will use the information collected to improve lenders' engagement in SBA programs. The findings will also be used to improve internal decision-making and inform program delivery aimed at increasing lenders' access to the SBA's capital programs. The aggregated results and recommendations will be shared in an evaluation report, briefings, and fact sheet.

PERSONALLY IDENTIFIABLE INFORMATION
1. Is personally identifiable information (PII) collected? [ ] Yes [X] No
2. If Yes, will any information that is collected be included in records that are subject to the Privacy Act of 1974? [ ] Yes [ ] No
3. If Yes, has an up-to-date System of Records Notice (SORN) been published? [ ] Yes [ ] No

GIFTS OR PAYMENTS
Is an incentive (e.g., money or reimbursement of expenses, token of appreciation) provided to participants? [ ] Yes [X] No
    If Yes, describe:

BURDEN HOUR COMPUTATIONS
The overall burden of the interview data collection is estimated to be 54 hours.

Category of Respondent	Number of Respondents	Participation Time (minutes)	Burden Hours
CDFI and MDI lenders	108	30	54

BURDEN COST COMPUTATION
The respondent cost burden for the data collection is estimated to be $2,645. The cost burden with lenders is based on the U.S. Bureau of Labor Statistics median hourly wage of $48.98 for General and Operations Managers in Credit Intermediation and Related Activities.

Category of Respondent	Number of Respondents	Burden Hours	Hourly Rate	Total Estimated Cost
CDFI and MDI lenders	108	54	$48.98	2,645

FEDERAL COST:
The federal government's annualized cost is $30,989, which includes 40 hours for a GS-14 evaluator, 30 hours for a GS-15 manager, and $27,137 for an independent third-party contractor.

REQUESTED APPROVAL DATE: May 30, 2023

ICR REQUEST CONTACT:
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