

U.S. Small Business Administration
Supporting Statement
Paperwork Reduction Act
Guaranteeing Fair Banking for All Americans Executive Order Reporting
OMB Control No: 3245-XXXX

1. Need & Method for the Information Collection.

On August 7, 2025, President Donald J. Trump issued the Executive Order entitled: “Guaranteeing Fair Banking for All Americans” (the “Fair Banking Executive Order”) instructing the SBA, along with there-defined federal banking regulators, to end the practice of politicized or unlawful debanking – the practice where banks and financial services providers, both independently and at the direction of federal regulators, freeze or close accounts, deny loans, and refuse services to politically disfavored people and businesses.

The Fair Banking Executive Order imposes an obligation on the SBA to require financial institutions subject to SBA’s jurisdiction and supervision to identify and remedy instances of politicized or unlawful debanking. The SBA consequently must collect related information to ensure its compliance with the Fair Banking Executive Order. Respondents shall provide SBA with a detailed report addressing and evidencing compliance with the requirements listed on the information collection. Lending institutions with under \$30 billion in assets that are supervised by a federal banking regulator may comply with this reporting requirement via the template provided on September 30, 2025.

2. Use of the Information.

The requested information will be used by SBA to comply with the Fair Banking Executive Order. Where SBA has been notified as a result of the collection that debanking policies, practices, or actions have occurred, SBA will follow up with the institution to ensure termination of such practices in compliance with the Fair Banking Executive Order.

Failure to comply will result in SBA taking appropriate oversight action. As provided for in SBA SOP 50 53 (2), these actions may include, but are not limited to, non-renewal of delegated authority, a headquarters meeting, increased reporting, a Supervisory Letter, requiring a Board Resolution or Commitment Letter, and for intermediaries, withholding of technical assistance grant funds and, as identified in the Fair Banking Executive Order, referral to the U.S. Attorney General for appropriate civil action.

3. Use of Information Technology.

Respondents must submit the reports by email to debanking@sba.gov. As a result, 100% of responses will be collected electronically.

4. Non-duplication.

Because of the nature of this information collection, there is no similar information already available to the Agency that would satisfy the purposes of the collection in order to comply with the Fair Banking Executive Order.

5. Burden on Small Business.

The information is submitted by SBA lenders. Although some of these lenders may be small under SBA size regulations, this collection of information will not have a significant economic impact on a substantial number of these entities. Further, to decrease the burden on small businesses, SBA has enabled lending institutions with under \$30 billion in assets that are supervised by a federal banking regulator to submit responses in a template form.

6. Less Frequent Collection.

This collection is required to comply with the Fair Banking Executive Order, and as a result, must be collected. This is a one-time collection and cannot be collected less frequently.

7. Paperwork Reduction Act Guidelines.

No special circumstances exist.

8. Consultation and Public Comments.

On September 22, 2025, SBA published a 60-day notice and request for comments at 90 FR 45451. The comment period closed on November 21, 2025. SBA received no comments on the content of the information collection. SBA received one question about the notification process and responded to that commenter directly. As a result, SBA is not making any modifications to the information collection.

9. Gifts or Payment.

Respondents do not receive payments or gifts for providing information.

10. Privacy & Confidentiality.

The Privacy Act, 5 U.S.C. §552a, and SBA's regulations found at 13 C.F.R. Part 102 provide the statutory basis and regulatory bases, respectively, for the retention of confidential information, including Personal Identifiable Information ("PII"). In accordance with the Privacy Act, SBA has issued various Systems of Records Notice ("SORN") to inform the public of how SBA collects, maintains, and uses confidential information and PII. SBA's SORNs that may be responsive to this Instruction No. 10 include SBA SORN 21, *Loan System*; SBA SORN 36, *Suspension and Debarment*; and SBA SORN 40, *Small Business Investment Company Information System*. These, and SBA's other SORNs, may be found at: [SBA Privacy Act Issuance](#).

11. Sensitive Questions.

SBA is not requesting any sensitive information as part of this endeavor. In the event any such information is received by SBA, it will be treated in accordance with the Privacy Act, 5 U.S.C. §552a, SBA's Regulations found at 13 C.F.R. Part 102, and all applicable SBA Systems of Records policies as set forth at: [SBA Privacy Act Issuance](#).

12. Burden Estimate.

Of the total 5,000 estimated respondents, 95% have an estimated burden time of 30 minutes, most of which are subject to the template response letter supplied by the SBA. The remaining 5% of respondents will have an estimated burden time of 6 hours: an estimated 3 hours dedicated to creating a script to search their loan history and an additional 3 hours to review the data. This creates a weighted average burden time of 46.5 minutes. $(0.95 \times 0.5) + (0.05 \times 6) = 0.0475 + 0.3 = 0.775$ hours.

According to the Bureau of Labor Statistics, the hourly mean wage for a financial manager as of May 2024 is \$86.76. As a result, it is expected that the average cost per response will be \$67.24.

Burden per Response:

	Time Per Response	Hours	Cost Per Response
Reporting	46.5 minutes	.775 hours	\$67.24
Record Keeping			
Third Party Disclosure			
Total	46.5 minutes	.775 hours	\$67.24

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Annual Burden:

	Annual Time Burden (Hours)	Annual Cost Burden (Dollars)
Reporting	3,875	\$336,200
Record Keeping		
Third Party Disclosure		
Total	3,875	\$336,200

14. Estimated non-recurring costs.

There are no additional costs to respondents.

15. Estimated cost to the Government.

When required, all forms are electronically submitted to the Agency; therefore, there is no appreciable collection cost associated with this information. The cost for the staff necessary to review the forms exists whether or not these forms are remitted to the Agency for review.

16. Reasons for changes.

This is a new collection.

17. Publicizing Results.

While SBA may publicize the general findings of this information collection, it does not intend

to publish specific responses by individual institutions.

18. OMB Not to Display Approval.

No exception being sought; the expiration date will be displayed.

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

Not applicable.

Part B: Surveys, Censuses, and Other Collections that Employ Statistical Methods.

This collection of information does not employ statistical methods.