

Author Full Name : Milan Boncich**Received Date :** 11/05/2020 02:32 PM**Comments Received :**

To whom it may concern:

The proposed change to the client counseling form (641) threaten small business privacy and the confidential relationship between the Brooklyn Small Business Development Center and the small businesses they serve.

Why doesn't the form mention that, by law, [section 21(a)7 of the Small Business Act] SBDCs are supposed to protect client privacy. Entrepreneurs should be told that BEFORE checking any box that gives away their privacy.

What purpose is served by soliciting a small business for other services, how is that an appropriate information collection.

Who are SBA's agents? This section should allow for a better understanding of what contact is being sought. The information collection should not allow for dissemination beyond the SBDCs.

How will SBA protect my information to the extent permitted by law? Under the Small Business Act the SBDC is prohibited from sharing my information at all. It would be simpler to not collect my information, as set forth in the law.

The information collection requires a small business to "waive all claims", why if they are protecting my information?

SBA is asking for this information to "meet Congressional and Executive Branch reporting requirements". That doesn't make sense. If the Small Business Act specifically prohibits SBDCs from sharing my information clearly Congress doesn't want it, and there is no need for SBA to have that information.

The justification for this form says SBA will comply with the E-Government Act, but that statute doesn't allow SBA to violate other statutes like the Small Business Act. Does the information collection mean SBA is choosing to follow one law but not another.

Did SBA conduct a Privacy Impact Assessment? Why isn't that mentioned? How did it deal with the privacy requirements of the Small Business Act?

SBA can't protect my information, there are too many examples of government agencies failing to protect personal information. Also, this suggests more dissemination of personal information which can only lead to less security.

SBA should make its request clearer and its intent clearer. They don't need my contact information to meet any statutory requirements, in fact Congress doesn't want the SBDCs to give my information to SBA or anyone else.

This information collection is unnecessary. SBA has no need for my contact information in order to do its job. My personal information is not a performance indicator.