



November 16, 2020

To Whom It May Concern,

In Re: Comment on proposed revisions to the SBDC client counseling form (641)

My name is Tim Dining and I am VP/GM for Jewell Instruments LLC in Manchester, NH. In addition, I have been a member of the NH SBDC Advisory Board for 18 Years (including Chairman for five years), and three businesses that I have worked for have been advising clients of the NH SBDC. I recently became aware that the U.S. Small Business Administration (SBA) is seeking comment on potential revisions to the client counseling form used by Small Business Development Centers and their clients. The changes would require SBDC's to report previously confidential client information to the SBA, including client names and contact information.

I find these potential changes deeply concerning. One of the most important components of the business advisor-client relationship is the fact that client privacy is protected. In fact, under Section 21(a)7 of the Small Business Act, SBDCs are supposed to protect client privacy. When a small business establishes a working relationship with a business advisor at the SBDC, we feel confident that the sensitive, financial information we share is confidential and is not shared outside of this trusted relationship. If that privacy is compromised, it could undermine the great value that SBDC business advisors are providing their clients.

The SBDC's programmatic impact on its clients and the economy is already collected and reported to the SBA. I wonder why SBA now wants identifying client information? If it is for the purpose of any type of solicitation of services that would damage the important relationship between the SBDC and its small business clients and it would breach the privacy protections of the Small Business Act.

Many entrepreneurs in NH, including myself, greatly value the SBDC as an important resource in our state. The SBDC's advisors are mentors and guides with whom we can be open and trust with our vital business information.

Please reconsider these changes and instead err on the side of caution and confidentiality. Small businesses need resources like the SBDC now more than ever– the proposed change to reporting will drive some potential new clients away.

Sincerely,

T.B. Dining

Timothy B. Dining
VP/ GM

