



April 28, 2025

Sheleen Dumas
Departmental PRA Compliance Officer
Office of the Under Secretary for Economic Affairs
Commerce Department
1401 Constitution Avenue NW
Washington, DC 20230

Re: OMB Control Number 0607-1004
Submitted to www.reginfo.gov/public/do/PRAMain

Dear Ms. Dumas,

I write to comment on the proposed 2025 Annual Business Survey (ABS) information collection, OMB Control Number 0607-1004, for the National Women's Business Council. This comment responds to the notice published at 90 Fed. Reg. 14231 on March 31, 2025.

Congress established the National Women's Business Council (NWBC) in 1988 with the passage of H.R. 5050, the Women's Business Ownership Act. This historic piece of legislation positioned NWBC to connect the voices of women entrepreneurs across the U.S. to policymakers in Washington, D.C., ensuring more of them would have fair access to entrepreneurial resources. NWBC is an independent, bipartisan federal advisory committee housed within the Small Business Administration (SBA), led by all-volunteer prominent women business owners and leaders of national women's business organizations. The Council's core mission is to advise the President, Congress, and the SBA Administrator on issues of importance to women business owners.

NWBC helped to initiate comprehensive federal collection of data about women-owned businesses, and has long been a user and advocate of the Census Bureau's products about firms and their proprietors. Detailed and reliable data about entrepreneurs and companies are essential to designing policies and programs that grow the economy and further prosperity for all. This comment cites past NWBC research reports and recommendations that may be relevant and instructive to determining whether proposed changes to the 2025 ABS can be implemented without loss of valuable information, and thus whether they should be adopted.

Sample Size Must Not Prevent Learning About Rural and Tribal Communities

NWBC studies and advocates for the needs of many entrepreneurs who are particularly stretched for time and resources, and for whom participation in a mandatory federal survey may be challenging. Minimizing burden for these owners is critical, and reducing the sample size for the ABS, as proposed, is consistent with this imperative. At the same time, research commissioned by NWBC has called out a dearth of statistical knowledge about the business environment in

rural and Tribal communities as a barrier to women's advancement. This deficit stems from the relatively small number of responses collected from these communities.

Policy recommendations that emerged from a literature review of women's entrepreneurship in rural, Tribal, and underserved communities included creation of "not only more data, but more systemic data capturing the entrepreneurial needs and experiences of U.S. rural, Tribal and other underserved women,"¹ including disaggregated data by gender, race, and location variables. Researchers also noted that for Tribal communities in particular, "[t]he biggest challenge in understanding the entrepreneurial experience...is a lack of quantitative and qualitative data,"² and that centering representation and input from communities that are the subject of data collection could help significantly to improve the quality and accuracy of resulting information. These comments support the Council's sense that a reduction in the number of ABS survey responses to be collected would be concerning if it were to diminish the availability of robust information about smaller populations. NWBC urges the Census Bureau to prioritize data quality and usability as it finalizes sampling methods and plans.

Collection Methods Must Be Designed to Reach All Business Owners

As an institution dedicating to producing actionable knowledge about women-owned businesses, NWBC knows that owners and businesses run the gamut from established and sophisticated to new and resource-limited. Good data science requires engaging this full spectrum of operators, including those with spotty or no access to digital communications and connectivity, those who are not confident working online, and those who struggle to find time and focus to complete detailed written questionnaires. With recent research results indicating, for example, continued need for investment in broadband connectivity to reach as-yet unserved businesses, NWBC is aware that some women owners will face technological and logistical barriers to participating in the ABS. These barriers could be exacerbated by the Census Bureau's intention not to conduct follow up calls with survey subjects by telephone. NWBC hopes the Bureau will take steps to ensure that the panel of businesses from which ABS responses are collected remains representative, notwithstanding prospective elimination of accessible phone contacts with subjects.

ABS Questions Should Reveal Businesses' Economic, Social, and Cultural Contributions

Women have made significant progress toward possessing and leveraging equal opportunity to start firms and succeed in business since NWBC's creation in 1988, when women owned an estimated 25 percent of companies in the U.S. As of 2021, women were the proprietors of nearly 40 percent of all privately-held businesses, according to the Census Bureau's combined Annual

¹ Dfusion, Inc., *Policy Recommendations Based on the Findings of the Literature Review of the Current Research on Women's Entrepreneurship in Rural, Tribal, and Other Underserved Communities in the United States* 5 (January 2024).

² *Id.* at 4.

Business Survey and Nonemployer Statistics by Demographics data.³ Business success typically has been measured by the number of businesses created and operating, and by companies' revenues and the number of jobs they have created. On those counts, however, women-owned businesses have underperformed: the authors of the Wells Fargo Impact of Women-Owned Businesses 2025 report estimate that they currently account for 9.6 percent of employment and 6.2 percent of sales and income.⁴

Economic measures of business achievements risk missing intangible, but no less critical, benefits that women-owned firms in particular are likely to bring to their communities and customers. Women entrepreneurs frequently are motivated to import previously unavailable products and services to their areas, to solve problems they personally encountered, and otherwise to serve communal goals and needs through their businesses. Women are more likely than men to tell the Census Bureau that helping the community is very important to them in considering their reasons for owning a business.⁵ Women are also active in mentoring and sharing multifaceted help with peers in their networks.

In recognition that the value of a business is manifested in more than just the amount of its financial activity, NWBC has studied and referenced information from the ABS and its predecessors about company partnerships and collaboration. In 2024, the Council formally recommended that officials “form an interagency working group to explore standardizing data collection about...community and social gains from women’s entrepreneurship.”⁶ Reports about the frequency and results of cross-sectoral engagement help to illuminate the extent of, and create policies to further encourage, business support for training, education, innovations leveraged in the public sector, and charitable community-building activities. These kinds of collaborations have many positive consequences, from more effective preparation of future talent to an accelerated pace of technical progress.

In hope that the ABS continues to serve the interest of building stronger complimentary ecosystems composed of government, academic, business, and nonprofit actors, NWBC encourages the Census Bureau to carefully examine the proposed elimination of questions about business collaborations with universities, government laboratories, federal agencies, and nonprofits around technology and intellectual property development. Other sections of the

³ Census Bureau, Annual Business Survey and Nonemployer Statistics Demographics, Table AB2100NESD05 – Urban and Rural Classification of Employer and Nonemployer Firms by Industry, Sex, Ethnicity, Race and Veteran Status for the U.S., States, Metro Areas, and Counties: 2021, https://data.census.gov/table/ABSNESED2021.AB2100NESD05?q=ab2100*.

⁴ Wells Fargo, Ventureneer, CoreWoman, WIPP Education Institute, *The 2025 Impact of Women-Owned Businesses* 13 (2025), <https://smallbusinessresources.wf.com/wp-content/uploads/2025/01/wells-fargo-2025-impact-of-women-owned-businesses-1MM-plus.pdf>.

⁵ Census Bureau, Annual Business Survey, Table ABS2200CSCBO – Owner Characteristics of Respondent Employer Firms by Sector, Sex, Ethnicity, Race, and Veteran Status for the U.S., States, Metro Areas, Counties, and Places: 2022, https://data.census.gov/table/ABSCBO2022.AB2200CSCBO?q=AB2200*&hidePreview=true&nkd=QDESC~O11.

⁶ National Women’s Business Council, *2024 Annual Report* 52 (2024), <https://www.nwbc.gov/annual-reports/2024/policy-recommendations.html>.



questionnaire may be edited to encompass details in questions slated for deletion. For example, the title of draft question C.7 could be amended to reflect interest not just in innovation but in any cooperative activities, and optional responses to question C.8 could include government laboratories, and distinguish between partnerships with universities and their students and personnel.

Conclusion

NWBC is grateful for the Census Bureau's continuous improvement of its critical business statistics programs, which has substantiated the need for and successes of programs and efforts like Women-Owned Small Business certification and Women's Business Centers. Data collection and resulting interventions have fueled economic prosperity for all by activating entrepreneurial talent and capital that had been sidelined; they must continue.

Thank you for your consideration of these comments, with best regards,

Erin Hustings
Associate Director of Policy and Research
National Women's Business Council