



Policies & Procedures

Orange County / Inland Empire SBDC Network

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

Table of Contents

1.0 SBDC Program Overview	1
1.1 Introduction	1
1.2 Purpose.....	1
1.3 The Orange County/ Inland Empire SBDC Network.....	2
1.4 Organizational Chart	3
1.5 California SBDC Leadership Council	3
1.6 Continuation of Funds	4
1.7 SBDC Program Organization and SBDC Name.....	4
1.8 Lead Center Program Operation	5
1.9 Recognition of the U.S. Small Business Administration and California State University Fullerton	6
1.9.1 General Disclaimer.....	7
1.9.2 Publication Disclaimer.....	7
1.9.3 Accessibility/Accommodation Notice	7
1.10 Shared Information.....	8
1.11 Network Branding & Logo Use	8
2.0 SBDC PROGRAM RESPONSIBILITIES.....	8
2.1 U.S. Small Business Administration	8
2.2 Host Organizations.....	9
2.3 Lead Center	9
2.3.1 Lead Center Director.....	9
2.4 Local Service Centers	9
2.4.1 Local SBDC/Satellite Offices.....	10
2.4.2 Local SBDC Director	10
2.5 Association of Small Business Development Centers (ASBDC)	10
3.0 SBDC STATEMENT OF WORK	11
3.1 Performance Measurements	11
3.2 Definitions of SBDC Program Services	12
3.3 Statutorily Required Services	22
3.4 Localized Program Needs and Services	25
3.5 Other Guidelines	26
4.0 SBDC CONSULTING & TRAINING SERVICES	35
5.0 SBDC OPERATIONS	35
5.1 Hours of Operation.....	35
5.2 Changes in Points of Communication	35
5.3 Travel	35
5.4 Private Sector Competition	36
5.5 Standards of Conduct	37
5.6 Conflict of Interest Policy.....	37
5.7 Facility Requirements.....	37
5.8 EEO and Disability Accessibility/Accommodation Requirements:	37
5.9 Program Identification	38
5.10 Disaster Operations Plan	38

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

5.11	Legal Services Restrictions	38
5.12	Publication and Postage Requirements	39
5.13	Contract Compliance/Issue Resolution/Probation	39
5.14	Small Business Week	39
5.15	Examinations and Accreditations	40
5.16	Leveraging Resources	40
5.17	Transition Activities	40
5.18	Annual Staff Development Study	41
5.19	Neoserra Lockdown	42
5.20	A,B,C,D & S Client Stratification Process	42
5.21	Staff Recognition	43
6.0	SBDC REVIEW AND REPORTING REQUIREMENTS.....	45
6.1	Required Performance Reports	45
6.1.1	Renewal Proposal	45
6.1.2	Semiannual Performance Report	45
6.1.3	Annual Performance Report	50
6.2	Annual Reviews	50
6.3	Examinations and Accreditations	51
7.0	SBDC FINANCIAL REQUIREMENTS AND PROCEDURES.....	51
7.1	Budget Period and Categories	51
7.2	Budget Preparation	52
7.2.1	Lobbying and Membership Dues	52
7.2.2	Justification of Costs	52
7.2.3	Subcontracting	53
7.3	Procurement Standards	53
7.4	Budget Modifications	53
7.5	SBDC Payment Request and Expenditure Summary	54
7.6	Cash/In-Kind Match Requirements	54
7.7	SBA Requirement for Allocation of Federal Funds	56
7.8	Carryover Requests	56
7.9	Program Income	57
7.10	Contract Close Out Package	57
7.11	Miscellaneous Financial Requirements & Procedures	58
7.12	Region Office Financial On-Site Reviews	59
8.0	RECORDKEEPING REQUIREMENTS	63
8.1	Counseling Activity Reports	63
8.2	Training Activity Reports	65
APPENDIX A: Conflict of Interest Agreement		a
APPENDIX B: Client Information Form – SBA FORM 641		d
APPENDIX C: Counseling Information Form – SBA FORM 641 Part III		h
APPENDIX D: Sample Counseling forms with Critique		i
APPENDIX E: Training Form 888		n
APPENDIX F: Co-Sponsorship Agreement		q
APPENDIX G: Sample Training Workshop Evaluation		s
APPENDIX H: Training Summary Report		t

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

APPENDIX I: Success Story Writing Guide..... u
APPENDIX J: In-Kind Affidavit & In-Kind Valuation Schedule w
APPENDIX J: On-Site SBDC Center Review Worksheet dd
APPENDIX K: Minimum Definitions for Economic Impact..... ii
APPENDIX L: SBDC Center Closeout Action Plan ll
APPENDIX N: SBDC Service Center Closeout List of Intellectual Property.....oo
APPENDIX O: SBDC Service Center Closeout List of Contracts, Programs and Partnerships pp
APPENDIX P: Closeout Program Narrative Report qq
APPENDIX Q: Closeout List of Advisors and Stakeholders rr
Appendix R: SBDC List of Equipment and Other Property tt
APPENDIX S: SBDC Fiscal Reports and Billing Templates..... tt
APPENDIX T: Annual Renewal Proposal Template xx
APPENDIX U: Client Potential Assessment (Business Viability) ppp
APPENDIX V: Sample National Impact Study Questionnaireqqq

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

1.0 SBDC Program Overview

1.1 Introduction

The Small Business Development Center (SBDC) Program is the U.S. Small Business Administration's (SBA's) largest matching grant-funded service delivery network providing quality customer service to the small business community. The SBDCs, in partnership with SBA's Office of Small Business Development Centers (OSBDC) and District Offices, develop programs and provide business management and other services that enhance the economic development goals and objectives of SBA and their respective states and their local funding partners.

The SBDC program creates a broad-based system of assistance for the small business community by linking the resources of federal, state and local governments with the resources of the educational community and the private sector. The Small Business Development Center (SBDC) Program is sponsored and partially funded by the U.S. Small Business Administration (SBA). Governed by Section 21 of the Small Business Act, 15 U.S.C. § 648, and federal regulations, 13 C.F.R. Part 130, the SBDC program has 63 Lead SBDCs—one in each state (four in Texas and six in California), the District of Columbia, Puerto Rico, the Virgin Islands, Guam and American Samoa and their corresponding Service Center networks. Although SBA is responsible for the general management and oversight of the SBDC program, a partnership exists between SBA and the recipient organization for the delivery of assistance to the small business community. SBDCs, under Section 21 of the Small Business Act (15 U.S.C. § 648), are required to provide consulting and training to small businesses including working with the SBA to develop and provide informational tools to support business start-ups and existing business expansion. In addition, pursuant to 13 CFR §130.340(c), SBA has identified certain Special Emphasis Groups (as defined in Section VIII, Part D, "Definitions"), to be targeted for assistance by SBDCs.

The national SBDC program is directed by the Associate Administrator for SBDCs (AA/SBDCs) under the direction of the Associate Deputy Administrator for Entrepreneurial Development (ADA/ED). The local SBA District Director (DD) is the primary contact for direction of the delivery of services to the small businesses in each District Office area, and for monitoring and overseeing the SBDC Cooperative Agreement and the ongoing local operations.

1.2 Purpose

The SBDC Program is designed to provide high quality business and economic development assistance to small businesses and nascent entrepreneurs (pre-venture) in order to promote growth, expansion, innovation, increased productivity and management improvement. To accomplish these objectives, SBDCs link resources of the federal, state and local governments with the resources of the educational

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

community and the private sector to meet the specialized and complex needs of the increasingly diverse small business community.

SBA funded programs, including: SBDCs, Women Business Centers (WBCs), SCORE, Veterans Business Outreach Centers (VBOCs) and U.S. Export Assistance Centers (USEACs), must work collaboratively with assistance from SBA's District Offices to coordinate their efforts in order to expand services and avoid duplication. Where the SBDCs are located in communities with these resource partners, the SBDCs will coordinate with them in offering training and other forms of assistance to their clients. SBDCs are encouraged to fully utilize the resources of other federal, state and local government, academic and private sector programs concerned with aiding small businesses in order to provide seamless but not duplicative business development assistance.

1.3 The Orange County/ Inland Empire SBDC Network

Since 2003, the Orange County/Inland Empire Small Business Development Center Network has been providing small businesses with the information and tools they need to thrive and prosper. Comprised of a Lead Center, based at the Mihaylo College of Business and Economics at California State University, Fullerton, and six primary service centers, Orange County SBDC, OC Hispanic SBDC, Inland Empire SBDC, Coachella Valley SBDC, LaunchPad SBDC and the Tritech SBDC, the Orange County/Inland Empire SBDC Network is focused on empowering small businesses.

MISSION:

The Orange County/ Inland Empire SBDC Network stimulates economic growth in Orange, San Bernardino and Riverside Counties by providing small business and entrepreneurs with expert consulting, effective training and access to resources.

VISION:

Leading the way for small business success.

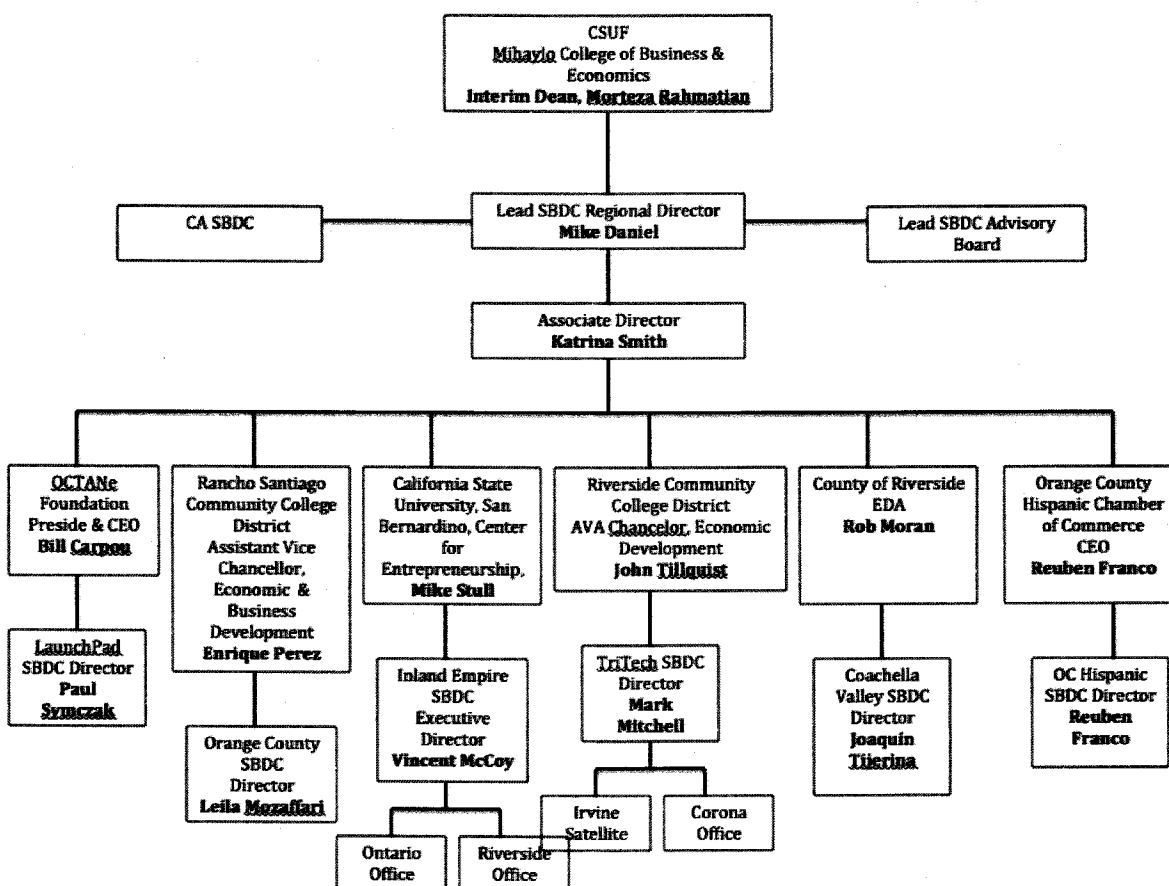
LOCATIONS:

<u>LEAD Center – CSU, Fullerton</u> 800 North State College Blvd, SGMH 5313 Fullerton, CA 92831 Phone: 657-278-2719	<u>Coachella Valley SBDC – County of</u> Riverside EDA 44-199 Monroe Street Indio, CA Phone: 760-863-2529
<u>Inland Empire SBDC – CSU, San</u> Bernardino 603 N. Euclid, Ontario, CA 91762-3223 Phone: 951-781-2345 Fax: 951-781-2353	<u>LaunchPad SBDC - OCTANE</u> 65 Enterprise Aliso Viejo, CA 92656 Phone: 949-330-6565 Fax: 949-330-6561
<u>Orange County SBDC – Rancho</u> Santiago Community College District	<u>TriTech SBDC – Riverside Community</u> College

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

2323 N. Broadway, Ste. 201 Santa Ana, CA 92706 Phone: 714-564-5200 Fax: 714-647-1168	152 E. 6 th Street Corona, CA 92879 Phone: 951-571-6480 Fax: 951-898-7946
OC Hispanic SBDC – Orange County Hispanic Chamber of Commerce 2130 E 4 th Street Suite #160 Santa Ana, CA 92705 (714) 953-4289	

1.4 Organizational Chart



1.5 California SBDC Leadership Council

The CA SBDC Leadership Council is comprised of six independent regions, based on the SBA district offices, and 42 primary service centers across the state (www.CaliforniaSBDC.org). The CA SBDC Leadership Council is considered one of the

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

largest and most successful economic development programs operating in the State of California and is the only program that is able to match against local dollars on a 2:1 basis.

Regional Network	Director	Counties Served
Northern California	Kristin Johnson	Del Norte, Humboldt, Mendocino, Sonoma, Marin, Napa, Solano, Contra Costa, Alameda, Santa Clara, Santa Cruz, San Francisco and San Mateo
Northeastern California	Dan Ripke	Siskiyou, Modoc, Trinity, Shasta, Lassen, Tehama, Plumas, Glenn, Butte, Lake, Colusa, Sutter, Yuba, Nevada, Placer, Yolo, Solano, Sacramento, El Dorado, Amador, Calaveras, San Joaquin, Alpine, and Tuolumne
UC Merced	Diane Howerton	San Luis Obispo, San Benito, Santa Clara, Monterey, Stanislaus, Merced, Madera, Tuolumne, Mariposa, Fresno, Kings, Tulare, Kern, Mono and Inyo
Los Angeles	Tim Mittan	Los Angeles, Ventura and Santa Barbara
Orange County/Inland Empire	Mike Daniel	Orange, Riverside and San Bernardino
San Diego and Imperial	Marquise Jackson	San Diego and Imperial

1.6 Continuation of Funds

It is SBA's intention to continue to fund SBDC applicants annually to ensure ongoing services to small businesses. However, an SBDC may not receive continued funding if there has been a clear showing of poor performance, improper activity affecting the operation and integrity of the SBDC, or a failure to follow the rules and procedures set forth in the statute, regulation and/or Program Announcement as incorporated into the Cooperative Agreement.

1.7 SBDC Program Organization and SBDC Name

The specific identification "Small Business Development Center" or "Small Business and Technology Development Center" shall be a part of the name of every SBDC organization within the SBDC network. No other name designations or variations will be accepted. The regional Small Business Development Center organization is referred to as the "Lead" SBDC. The Lead SBDC manages and administers a comprehensive small business assistance network, consisting of the lead center and its service centers, under the terms of a Cooperative Agreement between the U. S. Small Business

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

Administration and the California State University Fullerton Auxiliary Services Corporation. This network is part of the Small Business Development Center Program.

SBTDC Designation

An SBDC seeking designation as a Small Business and Technology Development Center (SBTDC) must submit an application for such designation to the Accreditation Committee of the ASBDC. Each applicant will be expected to fully address the strategic role to be played in its state, the programs and services to be offered, and the resources committed to technology-related management and technical assistance. Upon completion of its review of each application, the ASBDC will forward the applications along with its comments to the AA/SBDCs for approval or disapproval. SBA encourages all SBDCs to acquire a "T" designation as appropriate.

SBDC Program Organization and Terminology

The specific identification "Small Business Development Center" or "Small Business and Technology Development Center" shall be a part of the name of every SBDC organization within the SBDC network. No other name designations or variations will be accepted. SBDCs will have two years from promulgation of revised SBDC regulations (currently in progress) in which to make a necessary name change. The state SBDC organization is referred to as the "Lead" SBDC which manages and administers the statewide comprehensive small business assistance network, consisting of the Lead Center and its Service Centers. This network is part of the national SBDC program network. The Cooperative Agreement dictates the terms of agreement between the SBA and the Lead SBDC recipient organization.

1.8 Lead Center Program Operation

The Lead SBDC shall establish a program control center to provide administrative services to the SBDC network within the state / region.

These administrative services shall include, but not necessarily be limited to: (1) program development; (2) program management; (3) advocacy (4) promotion and public relations; (5) financial accounting; (6) reports management; (7) internal quality control and (8) Strategic planning. Records shall be maintained in the Lead SBDC indicating the Federal, State, local government, academic, and private sector resources available to the SBDC network and the types of services provided to clients.

The SBDC network shall provide services as close as possible to small businesses by using a variety of service delivery mechanisms, including satellite locations, traveling consultants, or electronic capabilities, when appropriate. The facilities and staff of each SBDC shall be located in such places as to provide maximum accessibility and benefits to the small businesses which the SBDC is intended to serve.

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

Other statutory requirements for the SBDC are outlined in 15 U.S.C. 648 (c)(2).

1.9 Recognition of the U.S. Small Business Administration and
California State University Fullerton

The SBDC program is a partially funded partnership program of the U. S. Small Business Administration and California State University Fullerton. Subject to the availability of funds, the SBA provides federal funding to the SBDCs on annual basis and each SBDC operates under the program's Federal regulations and Section 21 of the Small Business Act. Accordingly, SBDCs are expected to acknowledge SBA's and California State University Fullerton's support.

The SBA logo must appear prominently on all SBDC websites that are related to this cooperative agreement.

Under this Agreement, each SBDC Lead and Service Center must feature the SBA logo and/or official acknowledgement of support on all materials produced (either in whole or in part) using project funds (i.e., federal funds, matching funds and/or program income). This requirement does not apply to materials that are not produced using project funds. For purposes of this section, the term "materials" includes, but is not limited to, items such as press releases, brochures, reports, handouts, curricula, video or audio productions, advertisements, training booklets, websites, etc. The term "materials" does not include items such as stationery or business cards.

In addition, while SBDCs must display signage featuring the SBA logo at all facilities open to the public, such signage **must** also prominently feature the acknowledgement of support identified below. It is the intention of SBA that the use of co-branded logos should be phased out. Where an SBDC still possesses an existing inventory of materials featuring a co-branded logo, it may continue to use such materials until they are exhausted. However, no SBDC should order or purchase any new materials featuring a co-branded logo. In addition, each SBDC should begin efforts to remove co-branded logos from items such as websites and from signage at each Center's location.

Where used, the SBA logo may be positioned in close proximity to an SBDC's own logo or may be placed in a prominent location elsewhere in the material. Additionally, whenever an SBDC elects to use the SBA logo, the following statement **must** appear immediately below or adjacent to that logo:

*Funded in part through a Cooperative Agreement with the U.S. Small
Business Administration.*

This acknowledgement of support must appear verbatim and **may not** be altered or replaced with substitute language. However, on materials with severe space constraints such as signs and banners, an SBDC may substitute "SBA" for "U.S. Small

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

Business Administration" in the acknowledgement of support. The acknowledgement of support must be presented in a legible typeface, font size and - where applicable - color contrast.

On materials for which an SBDC does not elect to use the SBA logo, it must at a minimum feature the acknowledgement of support listed above. The SBA logo and/or acknowledgement of support **may not** be used in connection with SBDC activities that are outside the scope of the Cooperative Agreement. **In particular, UNDER NO CIRCUMSTANCES may the SBA logo or acknowledgement of support appear on items used in conjunction with fundraising; lobbying; or the express or implied endorsement of any good, service, entity or individual.**

1.9.1 General Disclaimer

The following disclaimer and acknowledgement of support must be in legible, easily readable print (within 2 inches of the SBA logo).

"Funded in part through a Cooperative Agreement with the U.S. Small Business Administration."

All publications, promotion pieces, websites, information and training materials must expressly acknowledge that the SBDC program is "a program supported by the U. S. Small Business Administration." This acknowledgement may include the SBDC's other major funding partners.

1.9.2 Publication Disclaimer

Where an SBDC produces materials which feature editorial content, it must use the following alternate acknowledgement of support (either independently or in conjunction with the SBA logo):

Funded in part through a Cooperative Agreement with the U.S. Small Business Administration. All opinions, conclusions, and/or recommendations expressed herein are those of the author(s) and do not necessarily reflect the views of the SBA.

1.9.3 Accessibility/Accommodation Notice

In accordance with Section 504 of the Rehabilitation Act and the Americans With Disabilities Act of 1990, all notices, promotional items, brochures, publications and media announcements informing the public of events, programs, meetings, seminars,

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

conferences and workshops sponsored or cosponsored by the SBA must include the following accessibility/accommodation notice:

"Reasonable accommodations for persons with disabilities will be made if requested at least two weeks in advance. Contact (Name, Address, Phone)."

1.10 Shared Information

The SBA will have an unlimited license and all rights to use data (excluding private client data), including those prepared or stored electronically, which are generated either partially or fully under the Cooperative Agreement, including materials that are copyrighted. Therefore, all SBDC-developed or funded training and/or information materials, such as publications, training guides/materials, online courses, online tools, web sites, etc. prepared for the betterment of small businesses will be readily available to SBA and all of its resources partners.

Any surveys or information collections to be conducted by the recipient as a requirement of the Cooperative Agreement are subject to the requirements of the Paperwork Reduction Act, as amended. The SBA agrees that, before requiring the recipient to conduct surveys or information collections, it will complete the necessary requirements under the Paperwork Reduction Act. Surveys conducted by the recipient, independent of the SBA, are not subject to the Paperwork Reduction Act.

1.11 Network Branding & Logo Use

Each SBDC shall comply with the most recent Branding Guidelines that is available in this folder regarding any marketing or advertising. This guidelines also outlines proper logo use for center, network, host, and SBA logos.

2.0 SBDC PROGRAM RESPONSIBILITIES

2.1 U.S. Small Business Administration

The SBA will be involved in the following:

- (A) Approving the acceptability of SBDC proposals (OSBDC and District Offices – in multi-district areas, each district director must sign the negotiated proposal);
- (B) Checking that SBDC activities conform to the requirements of the law, the Program Announcement, the Cooperative Agreement, SBA policy, and other areas agreed upon;

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

- (C) Monitoring and overseeing the Cooperative Agreement and ongoing operations of the SBDC network to see that Federal funds are used effectively and efficiently. This includes, but is not limited to: (1) reviewing records and files (including programmatic and financial reports); (2) reviewing procedures related to performance under this agreement; and (3) interviewing SBDC clients to determine satisfaction with SBDC services;
- (D) Checking that the SBDC has adequate policies and procedures to monitor the receipt and expenditure of program income, and checking that program income was used to further eligible SBDC program objectives;
- (E) Checking that priority assistance is provided to clients referred by SBA consistent with the SBDCs resources;
- (F) Determining the acceptability of SBDC activities submitted as part of accountability requirements; and
- (G) Participating in the evaluation of SBDC program operations and resolution of disputes and policy issues.

2.2 Host Organizations

The Host Organizations and CSUF Auxiliary Services Corporation enter into an annual contract. The Host Organization is responsible for the SBDC's compliance with the goals and milestones as specified in the annual contract. The SBDC center staff are employees of the Local Service Center and Host Organization.

2.3 Lead Center

The Lead SBDC is responsible for providing administrative services to the SBDC network within the designated Orange County/Inland Empire geographic area which covers Orange, Riverside and San Bernardino counties.

These administrative services shall include, but not necessarily be limited to: (1) program development; (2) program management; (3) promotion and public relations; (4) financial management; (5) reports management; and (6) internal quality control. Records shall be maintained in the Lead SBDC indicating the Federal, State, local government, academic, and private sector resources available to the SBDC network and the types of services provided to clients.

2.3.1 Lead Center Director

The Lead Director is located in a region with one Lead SBDC, The Lead District Director is designated by the OSBDC to be responsible for negotiating the Cooperative Agreement with the OSBDC.

2.4 Local Service Centers

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

The local service center is the headquarters office of an SBDC, which houses the Director and performs the majority of administrative duties, as well as providing the majority of SBDC services. They provide program development oversight of SBDC staff and consultants.

2.4.1 Local SBDC/Satellite Offices

Satellite Centers are staffed offices of the local service center which provides service in a part of the specified geographic region of the center.

2.4.2 Local SBDC Director

The Local SBDC Service Center Director oversees the center, monitors the budget, develops partnerships and alliances in support of the service center services, and serves as an external public relations representative of the SBDC.

2.4.3 Local SBDC Advisory Board

Each SBDC is may create an Advisory Board comprised of not less than six (6) members with the majority of members representing the small business sector. The Advisory Board should meet on no less than a quarterly basis. Copies of sign-in sheets for all Advisory Board meetings should be kept on file.

2.5 Association of Small Business Development Centers (ASBDC)

Created in 1979, the mission of the ASBDC is to assist the membership in the enhancement of their programs and activities, and to expand the role of the national network of SBDCs in order to contribute to the growth of state, regional, and national economies. The ASBDC:

- Assists members to pursue continuous improvement in order to achieve and maintain the highest level of quality in all services, based on Baldrige Quality Criteria. (Next accreditation cycle 2018)
- Facilitates educational and professional development needs of association members.
- Strengthens individual SBDC ties with key state executive branch officials, members of the state legislature, congressional delegation members, and leaders of local and state business organizations.
- Assists members in developing strong host institutions relationships.
- Promotes the SBDC program in order to strengthen its credibility, solidify its present support, and secure additional resources for the program.
- Provides administrative support for the ASBDC and quality services to its members through an appropriate management structure.

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

3.0 SBDC STATEMENT OF WORK

The SBDCs must employ their best efforts to ensure that their economic development and technical assistance services are available to all small business populations, including those Special Emphasis Groups such as minorities, women, Native Americans, 8(a) firms in all stages, veterans and service-connected disabled veterans, reservists called to active duty, people with disabilities, individuals currently and formerly receiving public assistance, individuals in low and moderate income urban and rural areas, and individuals located in Empowerment Zones and HUB Zones. (13 CFR 130.340(c)).

3.1 Performance Measurements

SBA, along with the other Federal Government agencies, is increasingly more focused on proven results, short- and long-term planning and performance-based budgeting as measured by achievement of negotiated and agreed upon goaled outputs and outcomes. SBDCs are expected to provide in-depth, substantive, longer-term, outcome-oriented consulting and training resulting in substantial economic impact as measured by successful business start-ups, job creation and retention and increased company revenues.

SBA and the SBDCs have jointly identified new performance measurements for the SBDC program as follows:

- ❖ Number of long-term counseling clients (5 hours or more of contact time –including prep time)
- ❖ Number of new business starts (when businesses are in revenue)
- ❖ Dollar Amount of Capital Infusion (to include SBA loans, non-SBA loans and equity investment)

2016 Network Goals:

Long Term Clients	Business Startups	Capital Infusion

Data for these performance measurements are collected through EDMIS2. Annual goal numbers are negotiated with local District Directors as part of the proposal submission process and, when approved, are incorporated into the Notice of Award. Approval of goals consists of OSBDC mapping the 63 network goal numbers with the most recent census, federal funding or other appropriate indexing tool/data to determine whether the goals developed correlate appropriately to population, business distribution and/or other factors. Where there are outliers, OSBDC will work with District Directors and the affected SBDC to ensure an immediate change or to phase in, over an appropriate time

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

period, the attainment of ideal milestone goals. Once OSBDC has approved the goals they are sent to the SBA Administrator for final approval. The District Office ED SCORECARD contains only one of these performance measurements: number of long-term counseling (extended engagement) clients; however, the OSBDC/OED SCORECARD will contain all three. All parties should be mindful that loan goals are not to be included in the negotiated goals.

The Association of Small Business Development Centers (ASBDC) Accreditation Standards 4.1.1 and 4.1.2 relate to the goals set forth above.

SBA also finds the following initiatives important as "national priorities" for SBDC recipients:

- ♦ Increased focus on:
 - manufacturing sector assistance.
 - working with faith-based and community organizations as appropriate.
 - procurement assistance.
 - veterans assistance.
 - technical assistance for Community Express applicants.
 - 8 (a) clients.
 - expansion and growth of existing businesses.
- ♦ Full participation in and utilization of EDMIS2.
- ♦ Continued participation in the three-year longitudinal ED Impact Survey through cooperation with SBA's contractor(s) – particularly the provision of client data. Non-participation will constitute a finding under SBA programmatic reviews.
- ♦ Provision of access to the SBDC Clearinghouse website for all ED resource partners.
- ♦ Support for Business Matchmaking.
- ♦ Enhanced online service delivery of SBDC services and establishment of an on-line training component as part of service portfolio.
- ♦ Conducting a periodic needs assessment process which results in integration with the SBDC strategic plan for services that support local needs.
- ♦ SBDC grant recipients should pursue a technology designation to provide a higher level of technology services to their clients, as appropriate.

Priorities for the OSBDC include:

- ♦ Performance and Budget Integration, including goaling and its methodology.
- ♦ Balancing the ratio of counseling to training, such that small business clients have a greater benefit of one-to-one, long term assistance.
- ♦ Continued cooperation between the SBA and ASBDC, such as training for new state/region directors, strategic planning and consistent economic measurement and performance of the program.

3.2 Definitions of SBDC Program Services

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

Budget Period

The 12-month period in which expenditure obligations are incurred by an SBDC network, coinciding with the calendar year.

Businesses Created, Number of (Reporting)

As computed by EDMIS, businesses are considered —Created if, at the previous session (whether in the current fiscal year, or a past one), the client was not —in business, and at a subsequent session or update (in the fiscal year being reported) was —in business (Form 641, Part II, Field 20 and Part III, Field 39).

Capital Infusion

Dollar Amount of SBA Loans

Dollar Amount of non-SBA Loans

Dollar Amount of Equity Capital (to include private investment) Dollar Amount of Equity Capital (to include private investment)

Capital infusion includes all forms of debt and investments from all sources (i.e., lines of credit, consumer debt products used specifically for the business, angel investors, owner's capital contributions, etc.). Credit lines and other revolving debt facilities/instruments are to be recognized for the full amount of the line of credit when established and not to be based on individual draw-downs.

Reporting Capital Infusion: Capital infusion will be tracked throughout each fiscal year and compiled from year-to-year to collect aggregate data. Capital infusion is the aggregate amount from Form 641, Part III, \$ Total Amount of SBA Loans, \$ Total Amount of non- SBA loans and \$ Amount of Equity Capital Received. Capital infusion shall be reported, client-by-client, once it is known as an update on Form 641, Part III, and uploaded to EDMIS on a quarterly basis. See Section 4.4 and Appendix F for step by step reporting.

Client

The client is the business, if it exists. In the case of a prospective business, the client is the individual (i.e., nascent entrepreneur or pre-venture) receiving SBDC services. Each client will be counted only once in a fiscal year, and the reporting will include both the number of sessions and the number of hours spent with the client. There are two types of clients:

Business Start Definition:

SBA Definition: Businesses are considered "Created" if, at the previous session the client was not "in business," and at a subsequent session or update was "in business."

Parameters:

A new client that enters the Orange County/Inland Empire SBDC Network will be considered a pre-venture/nascent client if one or more of the following criteria have not been met:

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

- Hired an employee prior to any sales transactions
- Has acquired debt or equity capital for business prior to any sales transactions
- Has opened up a bank account for the business
- Has incurred business expenses for the business
- Completed a DBA, Business License, Employer Identification Number (EIN) or other agency issued license or permit or has become certified to sell products or services to a state, federal or local agency whether sales transactions have occurred or not
- Has signed a lease agreement to open a business
- Incorporated the business prior to any sales transactions
- Has made a sale/transaction in the business

When a consultant assists the client in one of the above criteria, the client will be considered a business start.

- Start-up: those individuals (entities) who have been in business up to 12 months.
- Nascent (Pre-venture) Entrepreneur: those individuals who have taken one or more active steps to form a business, according to the Kauffman Foundation (www.kauffman.org). This includes individuals seeking assistance from SBA and/or one of its resource partners.

Contact

An SBDC Contact is an individual, or business entity, who requests and receives information pertaining to starting, managing or growing a small business. The information provided is categorized as information services. In order to be counted, a contact must receive more than 15 minutes, but less than 60 minutes of information services.

Contributions/Donations

Funds received by the SBDC with no conditions and may be used as match or overmatch in the year expended. Federal funds or amounts reported as match may not be used as contributions to others.

Consulting

Services provided to an individual and/or business that are: (a) substantive in nature and require assistance from a resource partner or District Office personnel in the formation, management, financing, and/or operation of a small business enterprise; AND (b) specific to the needs of the business or individual; AND (c) require a signed SBA Form 641 or equivalent form that supports SBA's management information database. Counseling is one-on-one, in person (face-to-face), on the telephone or electronic. To allow for reporting of time invested in a client, preparatory time will be tracked

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

separately from contact time but attributed toward counseling time in data reporting. Travel time will not count toward counseling time but will be tracked separately.

Face-to-face Consulting (in person):

- ❖ Meets the definition of —counselingll and should be no less than one hour initially (can include prep time in this initial calculation) and includes any counseling session thereafter regardless of time.
- ❖ Reporting Face-to-face Counseling: Each client will be counted once in a fiscal year, with the reporting to include both the number of sessions and the number of hours spent with each. If multiple people participate from one business, only one person will complete SBA Form 641. The counselor will note how many people were there so that the number of people served can be tracked. This will only be collected on the initial SBA Form 641.

Online Counseling (electronic):

- ❖ Meets the definition of “counseling” and the recipient of the counseling must acknowledge, through an SBA Form 641 or an SBA approved “electronic substitute,” the requirements imposed by accepting counseling assistance from the SBA or its resource partner(s) AND online counseling should be no less than 60 minutes initially (can include prep time in this initial consultation).
- ❖ Reporting Online Counseling:
At a minimum the following fields should be completed on SBA Form 641 or an SBA approved electronic substitute:
 - #3 – Client Name or approved client-coded name/number
 - #4 – Email Address
 - #10 – Zip Code

Telephone Counseling:

- ❖ Meets the definition of “counseling” and the recipient of the counseling must acknowledge, through an SBA Form 641 or an SBA approved “electronic substitute,” the requirements imposed by accepting counseling assistance from the SBA or its resource partner(s) AND telephone counseling should be no less than 60 minutes initially (can include prep time in this initial consultation).
- ❖ Reporting Telephone Counseling: At a minimum the following fields should be completed on SBA Form 641 or an SBA approved electronic substitute:
 - #3 – Client Name or approved client-coded name/number
 - #5 – Telephone Number
 - #10 – Zip Code

Number of Single-year, Long-Term Clients (contact and prep time): Meets the definition of —counselingll and requires 5 or more counseling hours of contact and prep time per individual or business during the fiscal year

Counseling/Consulting Session

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

An initial counseling session must be at least 60 minutes in length in order to be reported and includes any counseling session thereafter regardless of time. The SBA recognizes the quality and impact of SBDC counseling achieved through long-term relationships with clients and corresponding in-depth counseling. Further, the SBA acknowledges that SBDC counseling typically is measured in hours, not minutes, and the proven historical SBDC client economic impact statistics are principally a result of the significant investment in client counseling.

Consulting Case

See Client.

Number of Multi-year, Extended Engagement Clients (contact time only): Meets the definition of —counselingll and requires 5 or more cumulative hours of counseling contact time per individual or business during the fiscal year being reported in combination with any prior year (beginning October 1, 2005).

Distance Learning

Distance learning is the process of connecting learners with remote and multiple resources. Such learning uses communication technologies to stimulate continuous and lifelong learning. The technologies used include video, audio, computer, satellite, audio-graphic and print technologies.

Electronic Commerce (E-commerce)

Electronic commerce refers to all aspects of business and market processes enabled by the Internet and other digital technologies.

Employee: For purposes of the export counseling certification requirement, this definition consists of all professional (counseling and training) full time equivalents. This includes contractors (consultants) hired for counseling and training purposes

Equity Capital

Equity contributions to the business as reported on Form 641, Part III. Includes all funding (except loans) obtained by clients attributed to SBDC assistance including: grants, SBIR awards, equity investments (private and owner), etc.

Goals and Initiatives

Goals covers several years and are those established by the SBA Administrator or negotiated between the SBA District Office and the SBDC. SBDCs also have goals with their local funding partners. Initiatives are shorter term issues of interest or may include populations designated by SBA for special emphasis.

Grants Management Officer (GMO): The SBA official with delegated authority to obligate federal funds by signing the Notice of Award.

Information Transfers

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

Information transfers are contacts with individuals of a substantive nature that cannot be considered counseling or training because they do not meet the minimum time requirement of one hour. Recipients must report information transfers using SBA Form 2226. Elements that should be reported on the SBA Form 2226 include the following: phone calls; information packets disseminated; newsletters; website visitors requesting information; clients using onsite library materials; and clients attending presentations that do not qualify as training events.

In-Kind

In-kind is a non-cash match contribution based on the value of goods and services that are provided to the project, which may include office equipment and office space.

Key Personnel

Key personnel include Lead Center and Service Center directors or managers. It should also include key personnel for technology (at SBTDCs), designated International Trade personnel and contact designated to maintain PIMS information. It does not include trainers, consultants, counselors or support staff.

Loan Package

A collection of documents required by a lender used to make a business loan approval decision. It usually includes a business plan plus personal financial records such as tax returns and net worth statements. It stipulates the amount of money needed proposed, use of loan proceeds and evidence that the business can repay the loans on time. It usually includes personal (not business) guarantees of repayment and a listing of collateral – business or personal assets that can be used as security for the loan and may be liquidated by the lender to pay back the loan in case the business defaults on repayment.

Nascent Entrepreneur (Pre-Venture)

An individual who has taken one or more active steps to form a business. An individual who seeks assistance from SBA and/or one of its resource partners meets this definition. SBA's Office of Entrepreneurial Development (OED) includes nascent entrepreneur (pre-venture) as one of its three major market segments: nascent entrepreneur (pre-venture), start-up (individuals who have been in business up to twelve months), and, existing businesses, (businesses in operation more than one year and classified as small by the SBA). See Client.

Non-Debt Financing

Non-Debt Financing includes all financing obtained by clients as a result of SBDC assistance (except loans), such as: grants, SBIR awards, equity investments, licensing fees, and government contracts.

On-line Counseling

On-line or email counseling must conform to the same quality standards as person-to-person counseling. (See definition of consulting above). As such, on-line (or e-mail)

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

counseling must be substantive in nature and require assistance from an SBDC in the formation, management, financing, and/or operation of a small business enterprise. It must be at least 30 minutes in length to qualify as a session. The recipient of the counseling must acknowledge, through an SBA Form 641 or an SBA approved "electronic substitute," the requirements imposed by accepting counseling assistance from the SBA or its resource partner.

On-line Training

On-line training or a webinar must last 30 minutes or more and must conform to the same quality standards as person-to-person training. (See definition of training below). Such an activity may include a self-taught online training event or an interactive on-line course. Online training requires client registration, must be sponsored by the SBDC, and be delivered through the SBDC's website. Every attempt must be made to collect information from the individual that is collected on the SBA Form 888. If the on-line training is less than 30 minutes it will be counted as an information transfer. Participation shall be measured by registered "visits" (as opposed to "hits") at a specified website. There must be an evaluation and every attempt should be made to have the participant complete the information.

Person-to-Person Counseling

This is the one hour initial person-to-person session with the client on an individual basis. Subsequent sessions must be substantive in nature and should be tracked.

Prebusiness Workshop

A training program designed for individuals interested in owning and managing a small business or small business owners who have been in operation up to 12 months. The purpose is to provide a comprehensive introduction to the fundamentals of starting and managing a small business.

Prep Time

The amount of time spent preparing and researching information for a business or individual client. To allow for reporting of time invested in a client, preparatory time will be tracked separately from contact time but attributed toward counseling time in data reporting.

Program Funds

Includes all SBA/SBDC federal funds and all matching and overmatch expenditures reported on the SF-269 (includes non-cash). It does not include other funds under the SBDC umbrella.

Program Income

Gross income earned by the recipient that is directly generated by an activity supported with project funds or earned as a result of the award. Program income includes, but is not limited to, income from fees for services performed, the use or rental of real or personal property acquired under federally-funded projects, the sale of commodities or

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

items fabricated under an award, license fees and royalties on patents and copyrights and interest on loans made with award funds. Interest earned on advances of federal funds is not program income.

The definition for program income is contained in the SBDC Notice of Award and applies to all SBDC Lead Centers and Service Centers whether academic or state-based. In the SBDC program, the term "recipient" is an applicant organization for which funding is approved and which enters into a Cooperative Agreement with SBA. The recipient organization receives the federal funds and is responsible for establishing the Lead Center.

Recipient Organization

An applicant organization for which funding is approved and which enters into a Cooperative Agreement with SBA. The recipient organization receives the federal funds and is responsible for establishing the Lead Center.

Reporting Cycle

The reporting cycle for performance data is based on the Federal Government's fiscal year. Data must be reported to SBA based on the four quarters that occur during October 1 – September 30.

Satellite Service Center

A geographic point of service delivery where the SBDC sub-recipient is responsible for the lease and/or overhead.

SBDC Network/SBDC Program

The SBDC Network or the SBDC Program is the combination of the Lead SBDC, SBDC service centers, and satellite locations.

SBA Resource Partners

Organizations that provide services through SBA funding or through another recognized relationship with SBA. Resource partners include SBDCs, Service Corps of Retired Executives (SCORE), Veterans Business Outreach Centers (VBOCs), Women's Business Centers (WBCs), U.S. Export Assistance Centers (USEACs), the SBA MicroLoan Program microlenders and non-lender technical assistance providers and SBA Co-sponsorship and Memorandum of Understanding partners.

SBDC Service Center

A service center is an entity authorized by the Lead SBDC to perform SBDC consulting and training services. There is no direct relationship between a service center and the SBA.

Special Emphasis Groups

Groups whose members are underrepresented in the population of business owners compared to their representation in the overall population. Special Emphasis Groups

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

may include: disabled individuals, Native Americans or Alaska Natives, Black or African Americans, Asian Americans, Native Hawaiians or other Pacific Islanders, Hispanics, women, veterans, service connected-disabled veterans, self-employed Reserve and Guard members, transitioning military personnel and spouses, individuals in rural areas, individuals in HUBZones and individuals in low to moderate income urban and rural areas as determined by Census Bureau information, among others. This can vary from SBDC to SBDC depending upon location and demographics.

Start-Up Business

A business entity that has been in business up to 12 months. See also definition for Client.

Training (Including long-term training)

An SBDC training workshop or seminar is defined as an activity or event presented or cosponsored by a resource partner, district office or other SBA office or a third party which delivers a structured program of knowledge, information or experience on a business-related subject. The training must last for a minimum of one hour and include two or more clients in attendance.

Reporting Training: The SBA Form 888 is used to collect and report information on traditional classroom-style training. There must be two or more persons in attendance. The agenda and/or program content, attendee list, and evaluations are required for each training event. Records for these training events must be kept at the resource partner location and available for site review.

On-line training (or a webinars): is a structured program of knowledge, information or experience on an entrepreneurial or business-related subject. It must be of a quality and substantive nature, and include a registration process as well as an evaluation process (e.g. 1-5 star ranking). Online training can be synchronous or asynchronous. The training must be for a minimum of 30 minutes and a course evaluation must be made available, e.g., a resource partner provides a registration and link to the training; it can count as online training (note: must meet other criteria listed above).

Synchronous: A group of clients proceed through the training module(s) or program as a group.

Asynchronous: A client individually proceeds through the training module(s) or program individually and is self-paced.

Reporting Online Training: An SBA Form 888 is required for all online training events. There must be one or more clients participating in the online training. At a minimum, the following fields should be completed on a registration form for on-line training:
Client Name or approved client-coded name/number
E-mail Address
Zip Code

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

In addition, every attempt should be made to collect these data:

Race
Ethnicity
Gender
Disability
Veteran Status
Military Status

Client registration records and other course information must be retained and made available for review.

e.g. If the resource partner holds an online training session with five satellite events with individual sign-ins, facilitators, etc., they should count as five different training sessions, as each meets the definition of "online training."

Co-hosted Training (Collaborative)

Meets the definition of "training" and is further defined as an activity where each host organization actively participates and contributes substantially to the training.

Reporting Co-Hosted Training: When reporting training numbers for a co-hosted training, the hosts must work together to determine how to equitably divide the number of clients among themselves. Double counting of clients is not permitted.

Examples involving multiple resource partners contributing to a single training event:

A) If each resource partner contributes a significant amount of presentation time (defined as one hour or more per partner), then each host could count all attendees. Accordingly, if five partners co-hosted a training event with five hours of total presentation time (each partner delivering training for at least one hour) and fifteen persons attended the event, each partner could count fifteen persons trained for one hour each.

B) If each partner puts in less than one hour (per partner) of presentation time, the attendee count would be divided among the hosts based on mutual agreement. Accordingly, if five partners co-hosted a training event with 1.5 hours of total presentation time (each partner delivering training for less than one hour) and fifteen persons attended the event, the partners would negotiate how to divide the number of attendees (e.g., each partner could count three persons trained for 1.5 hours).

Reporting Training with Multiple Sessions: Each session of a multiple-session training program or course may be counted as an individual course on SBA Form 888. Sessions must correspond with the minimum training duration identified in the definitions listed above.

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

Training Hours (Total Number of Training Hours)

Total hours of training hours are the number of hours that the trainer spends teaching the training session.

Travel Time

The amount of time spent traveling to/from a location (separate from assigned post-of-duty) to meet with business or individual clients. If meeting with more than one client, travel time is only counted once. Travel time will not count toward counseling time, but will be tracked separately.

3.3 Statutorily Required Services

SBDCs are required to provide the following services:

1. On a non-fee basis, one-on-one confidential counseling:
 - ❖ Working with individuals to increase awareness of basic credit practices and credit requirements.
 - ❖ Working with individuals to develop business plans, financial packages, credit applications and contract proposals.
 - ❖ Working with the Administration to develop and provide informational tools to assist individuals with pre-business startup planning, existing business expansion and export planning.
 - ❖ Working with individuals referred by the SBA District Offices and SBA participating lenders. (Note: Providing any preferential treatment to clients of any specific lender is prohibited, as is the SBDC's acceptance of payment for the provision of counseling services.) and
 - ❖ SBDCs must have counselor resources available to meet the needs of entrepreneurs throughout the SBDC's designated service territory.
2. Technology transfer, research and development:
 - ❖ Working to increase the access of small businesses to the capabilities of automated flexible manufacturing systems;
 - ❖ Working through existing networks and developing new networks for technology transfer;
 - ❖ Encouraging partnerships between the small business and academic communities to help commercialize university-based research and development;
 - ❖ Introducing university-based engineers and scientists to their counterparts in small technology-based firms; and
 - ❖ Exploring the viability of developing shared production facilities under appropriate circumstances.
3. Rural Assistance:
 - ❖ Assisting small businesses in rural areas in an effort to increase their participation in exporting, government procurement, tourism, access to credit,

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

incubators, innovation and technology and other small business programs, in cooperation with the U.S. Department of Commerce (DOC) and other relevant federal agencies; and

- ♦ The SBDCs may develop marketing and production strategies that will enable the rural businesses to better compete in the domestic market, provide technical assistance needed by rural small businesses, make available managerial assistance to rural small business concerns and provide information and assistance in obtaining financing for business startups and expansion.

4. Exporting Assistance:

- ♦ In cooperation with SBA's Office of International Trade, the Department of Commerce and other relevant federal and state agencies,
- ♦ Recipients of awards made under this Program Announcement are required by law to have at least five (5) of their employees or ten percent (10%) of the total number of their employees (in the network), whichever is fewer, certified as export assistance counselors. SBA will work with Recipients to determine what constitutes adequate certification and will, subject to the availability of appropriations, reimburse Recipients for costs relating to the certification of employees as export assistance counselors. Recipients must submit, as part of their technical proposal and budget submission, the number that need to be certified to meet the requirement, the current number of certified counselors on board in the network at the time of application submission and their plan, including timeframe, for attaining compliance with this requirement.
- ♦ assist small businesses in exporting by identifying and developing potential export markets; facilitating export transactions; develop trade linkages between U.S. and foreign small business firms; assist small businesses to participate in international trade shows; assist small businesses in obtaining export financing; and facilitate the development or reorientation of marketing and production strategies.
- ♦ Where appropriate, the SBDC and the SBA may work in cooperation with state governments to establish a state international trade center for these purposes;
- ♦ Provide exporting assistance to rural areas;
- ♦ Refer small businesses to appropriate resources for trade adjustment and trade remedy assistance.
- ♦ Report client data for exporting assistance including the numbers of clients assisted; numbers of new exporters; numbers of new markets entered; export revenues; referrals to a USEAC or SBA; referrals to the Department of Commerce, Department of Agriculture, Department of State, Ex-Im Bank, OPIC or the USTDA; number of jobs created or retained. Also, number of staff completing certification for export assistance as defined by SBA.
- ♦ Develop a program in conjunction with the U.S. Export Assistance Centers

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

and local and regional SBA offices that will enable SBDCs to serve as an information network and to assist small business applicants for trade finance programs, and otherwise identifying and helping to make available export financing programs to small businesses.

- ❖ Work with SBA's USEAC personnel to conduct Export Trade Assistance Partnership (E-TAP) programs to help increase small business participation in international trade.
- ❖ Work closely with the small business community, small business consultants, state agencies, universities and other appropriate groups to make translation services more readily available to small business firms doing business, or attempting to develop business, in foreign markets.
- ❖ The SBDC may provide small business owners with access to a wide variety of export-related information by establishing on-line computer linkages between SBDCs, U.S. Export Assistance Centers, the Department of Commerce (www.export.gov) and their respective informational international trade databases.

5. Base Closures Assistance:

Assisting small businesses to develop and implement strategic business plans to timely and effectively respond to the planned closure or reduction of a Department of Defense (DOD) facility within the community, or actual or projected reductions in such firms' business base due to the actual or projected termination or reduction of a DOD program or a contract in support of such program.

6. Regulatory compliance:

- ❖ Maintaining current information concerning environmental, energy, health, safety and other federal, state, and local regulations that affect small businesses and counseling small businesses on methods of compliance.
- ❖ Counseling and technology development shall be provided when necessary to help small businesses find solutions for complying with environmental, energy, health, safety and other federal, state and local regulations.
- ❖ Developing information publications, establishing resource centers of reference materials, making appropriate referrals to the SBA's Office of the National Ombudsman and distributing compliance guides published under section 212(a) of the Small Business Regulatory Enforcement Fairness Act of 1996, PL 102-121.

7. Specific informational needs:

- ❖ Providing specific informational needs and assistance, including:

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

- ❖ Coordinating and conducting research into technical and general small business problems for which there are no ready solutions.
- ❖ Providing access to comprehensive physical and/or electronic libraries that contain current information and statistical data needed by small businesses.
- ❖ Maintaining a working relationship and open communications with financial and investment communities, legal associations, local and regional private consultants and local and regional small business groups and associations in order to help address the various needs of the small business community.
- ❖ Conducting in-depth surveys for local small business groups in order to develop general information regarding the local economy and general small business strengths and weaknesses in the locality
- ❖ Using and compensating qualified small business vendors, including but not limited to, private consulting engineers and private testing laboratories to provide services to small businesses.
- ❖ Maintaining lists of local and regional private consultants to which small businesses can be referred.
- ❖ Providing information and assistance to small businesses about establishing Drug-Free Workplace programs.

3.4 Localized Program Needs and Services

It is acknowledged that SBDCs receive funding and must meet the mandates of its other funding sources. Despite these mandates District Directors and SBDC State/Region Directors should negotiate services to meet local identified needs including:

1. Entrepreneurial Development Services
 - ❖ Assisting manufacturing workers interested in starting their own business and working closely with the U.S. Department of Commerce, National Institute of Standards and Technology's Manufacturing Extension Partnership (MEP) Program to assist small manufacturers.
 - ❖ Providing programs focused on existing businesses to assist them with growth and expansion.
 - ❖ Developing, facilitating and/or leveraging appropriate distance learning programs and/or initiatives that can be utilized by small business clients, and where appropriate, other SBA resource partners.
 - ❖ Using the SBDC Clearinghouse, also known as the SBDC Net, to assist in serving the needs of the small business community.
 - ❖ Assisting people with disabilities to consider entrepreneurial opportunities and to succeed in business.
 - ❖ Collecting, categorizing and making available, in consultation with the SBA, turn-key training programs representing the best-of-the-best from SBDCs. Such training programs must be in electronic format and include a course syllabus, lecture presentation, faculty notes, outreach materials and an accompanying student text or information summary.

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

- ❖ Developing economic recovery programs and plans which include counseling of small business owners on ways and means to rehabilitate on-going businesses through a re-directed approach to marketing and financial management. Subjects for counseling may include advice in seeking alternative markets for products or repackaging of outstanding loans or other financial obligations and credit counseling for the reprogramming of debt. Training may also be offered to small business owners which will introduce them to the new methods of doing business, such as e-commerce, etc.

2. Economic Development Involvement

Participating in and actively supporting community development in their areas of geographic responsibility. This includes coordination and involvement with all levels of government – federal, state and local in support of initiatives that strengthen the infrastructure of the community and ensure stability and equality in community-based economic growth and development. The private sector, including business and professional organizations, should be invited to become stakeholders in the development of the community. SBDCs should act as catalysts to initiate development projects beneficial to the community as a whole.

3. Government Contracting Assistance

- ❖ Promoting SBA's SBIR and STTR programs.
- ❖ Providing information and assistance to small business owners interested in pursuing federal, state and local prime contract and subcontract opportunities.
- ❖ Advising and assisting small business owners in developing and executing effective marketing and sales plans for targeting federal prime contracts.
- ❖ Working cooperatively with the Procurement Technical Assistance (PTAC) program.

4. Access to Capital and Other SBA Programs

- ❖ Providing financial packaging and other financial counseling assistance; including assistance for disaster loans, Community Express and export financing programs.
- ❖ Providing access to tools and initiatives offered by SBA's Office of Veterans Business Development (OVBD).
- ❖ Informing small business contractors about SBA's Surety Bond Guarantee Program.
- ❖ Supporting the SBA Center for Faith-Based and Community Initiatives, as appropriate.

3.5 Other Guidelines

Center for Faith Based & Community Initiatives

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

SBDC's are encouraged to coordinate activities through either a contractual or partnership relationship with faith based and community organizations. SBDC's are also encouraged to coordinate their efforts with SBA's Center for Faith-Based and Community Based Initiatives which is designed to open Government programs to these organizations to improve their communities. There are no grant funding set-asides for faith-based organizations. Instead, the Faith-Based and Community Initiative creates a level playing field for faith-based as well as other community organizations to work with the government to meet the needs of America's communities. SBA is one of ten federal agencies with a Center for Faith Based and Community Initiatives.

Co-sponsorship Agreement

If one or more organizations and the SBA is involved with an SBDC as co-sponsors, a Co-sponsorship Agreement must be executed by SBA, the SBDC, and all co-sponsors of an activity in accordance with SBA's Co-sponsorship SOP 90 75 2 or revised equivalent.

Environmental Assistance

Environmental assistance includes any activity that encourages, supports and enables small businesses to develop, market and/or adopt environmental technologies (including pollution prevention) to achieve economic growth and environmental compliance. SBDCs are encouraged to consult with appropriate state and/or local providers of environmental technical assistance programs.

Financial Assistance

SBDCs should work with their SBA District Offices to provide services that increase a small business' access to capital. SBDCs are encouraged to develop linkages with lenders, Small Business Investment Companies (SBICs), venture capital firms, Certified Development Companies (CDCs), SBA microlending intermediaries and state and local finance programs.

SBDCs will assist small businesses with business plan development, financial statement preparation and analysis, cash flow preparation and analysis, source and application of funds. In addition, SBDCs, in cooperation with SBA District Offices, are expected to offer service to new SBA clients and to assist delinquent SBA borrowers who are referred to them by SBA and/or lenders to assist in problem solving, business restructuring, cost analysis, market penetration and other similar subjects.

Financial Packaging Assistance Guidelines

SBDCs are encouraged to provide counseling services that increase a small business concern's access to capital, such as business plan development, financial statement preparation and analysis and cash flow preparation and analysis.

SBDCs should help prepare their clients to represent themselves to lending institutions. While SBDCs may attend meetings with lenders to assist clients in preparing financial packages, they may not take a direct role in representing clients in loan negotiations.

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

SBDCs should inform their clients that counseling assistance or financial packaging assistance does not guarantee receipt of a loan.

Financial Assistance Restrictions

SBDCs cannot make loans, service loans or make credit decisions regarding the award of loans.

The SBDCs must not take a direct role in representing clients in loan negotiations. They should, however, help prepare their clients to represent themselves to lending institutions and may attend meetings with lenders to assist clients in preparing financial packages.

SBDCs must not advocate, recommend approval or otherwise attempt in any manner to influence SBA to provide financial assistance to any of its clients. SBDCs may not charge fees for providing assistance for financial packaging. (Note: Providing any preferential treatment to clients of any specific lender is prohibited, as is the SBDC's acceptance of payment for the provision of counseling services.)

International Trade Center (ITC)

International Trade Centers (ITCs) are specialty centers within the SBDC network dedicated specifically to providing international trade services. Where appropriate, SBDCs will establish ITCs to focus on export assistance to small businesses. ITCs must have a separately designated and full-time Director and qualified professional staff. They must have a separate budget within the SBDC and there must be separate international trade related counseling and training milestones established in the SBDC Cooperative Agreement. Separate brochures marketing the SBDC's international services must be developed and distributed.

The ITC will coordinate and use public and private resources to provide assistance to small businesses, and particularly to those small businesses new to exporting, or with export finance packaging needs.

ITCs will provide a broad range of services as appropriate and needed by the small business community, including the following:

- (A) Assist SBA by supporting Export Assistance Centers sponsored by SBA, the Department of Commerce, the Export-Import Bank, and other federal agencies.
- (B) Assess client's export-related financing needs and assist clients in structuring and compiling necessary documentation, (i.e., business plan development, financial statement and analysis, cash flow preparation and analysis, source and application of funds, letters of credit, etc.) for export financing, and particularly for SBA's Export Working Capital Program.

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

- (C) Develop linkages with local lenders, SBA District Export Finance Officers, Ex-Im Bank personnel and U. S. Export Assistance Center personnel.
- (D) In cooperation with SBA, develop an Export Trade Assistance Partnership (E-TAP) program on an annual basis for new exporters. Create an E-TAP Task Force for its development and cooperation with other appropriate private and public sector partners to provide counseling and training for this program.
- (E) Develop and conduct seminars on opportunities and procedures involved in exporting, export finance, joint ventures, licensing, ISO 9000 and other International Standards Registration, metric conversion and so forth.
- (F) Identify and analyze client's international trade needs, capabilities and problems, and provide in-depth counseling in international trade techniques, procedures and opportunities.
- (G) Use services available through the Federal Bar Association/SBA Agreement to assist in the resolution of client's international trade/legal problems, the Export Legal Assistance Network (E-LAN).
- (H) Assist SBA in promoting and recruiting participants for SBA cosponsored events including those with the Department of Commerce, the Overseas Private Investment Corporation, the Agency for International Development and the Export-Import Bank.
- (I) Assist SBA in disseminating information on trade promotion, trade finance, trade adjustment and trade remedy assistance.

Manufacturing Assistance

Many SBDCs partner with the Department of Commerce, National Institute of Standards and Technology's Manufacturing Extension Partnerships (MEPs) to provide specialized services to small manufacturers. Through this partnership, a small manufacturer can receive business management assistance from the SBDC and engineering assistance from the MEPs. Most SBDCs and MEPs view the partnership as significant.

All SBDCs that are partnering with the NIST MEPs are encouraged to continue this valuable assistance to small business manufacturers. SBDCs without a working partnership with the NIST MEPs may wish to pursue one. The nature of any participation with MEPs must be reported in the semiannual and annual reports to SBA.

Minority Enterprise Development

SBDCs should work with their SBA District Offices to provide training and counseling to firms in all stages of participation in the 8(a) Program. Each SBDC must make all of its economic development and technical assistance services available to 8(a) firms in all stages, other minority business owners and prospective minority business owners. SBDCs are encouraged to make special efforts to assist SBA's Minority Enterprise

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

Development 8(a) Program. These efforts include community-based seminars and workshops concerning the SBA's 8(a) Program application process.

SBDCs should inform their 8(a) clients that counseling assistance does not guarantee receipt of a contract.

Native American Assistance

Each SBDC must make its economic development and technical assistance services available to Native Americans. Local initiatives for Native Americans shall be supported when appropriate, and to the extent possible, by the appropriate SBDC where it is determined that this assistance is needed. Where appropriate, SBDCs shall provide support to initiatives of SBA's Office of Native American Affairs (ONAA).

Procurement Assistance

SBDCs are encouraged to provide services that provide basic information needed by small business concerns interested in procurement opportunities in the Government arena. These services should include, but not be limited to:

- (A) Providing information on Government buying methods.
- (B) Identifying the role of SBA Area Directors for Government Contracting located in SBA field offices and Procurement Center Representatives (PCRs) located at Federal Government purchasing activities.
- (C) Educating small businesses about the Federal government's move toward doing business by Electronic Data Interchange, marketing techniques and placement on agency bidders' lists.
- (D) Assisting with the preparation of bids and proposals.
- (E) Identifying subcontracting opportunities.
- (F) Providing counseling and referral information concerning bidders' rights and obligations, appeal procedures, termination and default actions, and size criteria (business advice, not legal advice).
- (G) Providing assistance on contractual, financial and contract administration issues.
- (H) Developing and/or maintaining computerized systems that identify federal, state and local procurement opportunities.
- (I) Assisting eligible small business firms to complete and submit of the HUBZONE Empowerment Contracting Program electronic application.

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

- (J) Working cooperatively with the Procurement Technical Assistance (PTAC) program.

Rural Development

SBDC applicants must make a full range of business development and technical assistance services available to small businesses located in rural areas. These services will be designed to increase rural small business participation in exporting, government procurement, tourism, access to credit, incubators, innovation and technology and other small business programs.

Surety Bond Guarantee Assistance

SBDCs are encouraged to educate their resources and small business contractors about the Surety Bond Guarantee (SBG) Program. This includes making available program information at counseling and training sessions and at business, professional and trade association meetings. SBDCs should develop an outreach program and actively promote the SBG program to special emphasis contractors. SBDCs should refer small business contractors to the SBG specialist in one of the four SBG Area Offices (Philadelphia, Atlanta, Denver and Seattle) for detailed information about the program. The Office of Surety Guarantees in SBA Headquarters will provide a power point presentation for this purpose. An SBDC should contact (202)205-6540.

Many contractors are able to leave the program and obtain bonding on their own while others remain in the program for several years. One reason small contractors continue in the program is that they lack management expertise and have ongoing cash flow problems. SBDCs are encouraged to work with the SBG specialist in the appropriate Area Office to identify such contractors and give them the needed business management assistance. Among other areas, this may include business plan development, cash flow preparation and analysis, bid preparation, marketing and financial statement preparation and analysis.

Technical Assistance

The Lead SBDC must make technical assistance available to small businesses including, but not limited to: access to published technical information; eCommerce training, access to technical consultants; energy audits and conservation plans; product analysis and improvement; new product development; plant layout; assisting inventors and high technology firms to research, develop and market their ideas and inventions; assisting non-technological firms to gain access to existing technologies; solution of manufacturing or operations problems (using "Just-in-Time" computer aided manufacturing and computer aided design where appropriate); SBIR-related assistance; facilitating the transfer of technology and technical data from federal and university laboratories; assisting competitive positioning through total quality management (TQM), information technology, pollution prevention and other environmental assistance; and conducting economic studies and projects.

Training

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

Applicants will provide quality training designed to improve the skills and knowledge of existing and prospective small business owners/managers throughout the SBDC network. Where appropriate, SBDCs are encouraged to utilize educational technology such as computer-based instruction, distance learning initiatives, video tapes and other electronic mediums to enhance the distribution and quality of educational services.

Training generated by SBDCs must be coordinated with the SBA Project Officer to avoid duplication with training efforts offered by other local organizations and SBA. In addition, all training materials developed in an electronic format shall be made available to the SBA SBDC Project Officer, SBDC Clearinghouse and all SBA resources. SBDCs may charge reasonable fees to cover program costs associated with this training. These fees are considered program income and shall be used to expand services and further SBDC program objectives.

An SBDC training workshop or seminar is defined as an activity or event in which a counselor from a resource partner, District Office personnel or a third party actively delivers a structured program of knowledge, information or experience on a business-related subject. There must be two or more attendees. A training course must last a total of an hour or more to be counted as training. Courses with multiple sessions count as one course. An agenda, attendee list and evaluation must be kept in the file. The SBDC must use SBA Form 888 to document and report SBDC training activities. SBA's management information system collects both the number of sessions and hours for the course.

SBDC Co-hosted Training

SBDCs are encouraged to enter into co-hosted training arrangements with the private sector and other organizations to extend outreach and productivity. (Cooperation between members of the SBDC network; i.e., Lead Center with service centers or other organizations funded through the Cooperative Agreement with SBA is not considered a co-hosting.)

In order for an SBDC to receive credit for a co-hosted training event, it must actively participate (i.e., provide speakers, materials, publicity) with the organization assuming primary responsibility for financing the training session. Final responsibility for the quality of the training rests with the SBDC. When reporting training numbers for a training session co-hosted by the SBDC and another SBA resource partner (e.g., WBC, SCORE) and the training session is of such duration that each partner is training for less than one hour each, the partners must work together to determine how to equitably divide the number of clients among themselves. No double counting is permitted so the number that they partners report must equal the total number of attendees at the event. However, in the case where there are breakout sessions lasting one hour or more given individually by the resource partners, then each resource partner can count any attendees participating in their breakout sessions as long as there is a sign-in sheet, an evaluation, and an SBA Form 888 is prepared. Where the training is of such duration that its length is equal to or more hours than the number of ED partners co-hosting the

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

event (i.e., one hour per partner), all partners can report the full number of attendees for the training.

For all co-hosted training among ED resource partners where there will be a distribution of receipts in whole or in part to the co-host, the training file for the activity must document clearly the role and responsibility of the SBDC and each participant receiving a share of the receipts. How the receipts were distributed must also be documented in the training file.

SBDCs are reminded that income received by the SBDC network for all co-hosted programs cannot be used for match funding and should be used to further support the SBDC.

Veteran and Service-Connected Disabled Veteran Business Ownership

Each SBDC will make available all of its economic development and technical assistance services to veterans, including service-connected disabled veterans and their immediate families as well as Reservists and National Guard members called to active duty. Both national and local initiatives for veterans shall be supported by the appropriate SBDC as needed. Each SBDC network will establish a minimum of one Veteran Entrepreneurial Training (VET) Program for veterans, service-connected disabled veterans, Reservists and National Guard members as well as active duty military personnel who are pending discharge. The program may include feasibility and marketing studies, preparation of business plans and loan packages and formation of support groups to provide follow-up and encouragement to participants.

The SBDC may be requested by SBA to provide specific training and counseling with respect to business opportunities or government contracting, in connection with a local base closing.

SBDCs should contact their state National Guard Adjutant General and all units of the Military Reserves to identify Reservists and National Guard members who are operators of small businesses; are otherwise self-employed, or are essential employees in small businesses, and who have been or may be mobilized pursuant to Title 10 U.S.C. for active duty. SBDCs should offer and provide business interruption counseling and training as needed to minimize adverse financial and operational problems. Such counseling could include, but is not limited to the offering advice on the best feasible means of winding up of business operations and the utilization of federal and state laws, (including the Soldiers and Sailors Relief Act), enacted to protect small business persons who are subject to mobilization to active duty. Additionally, business assistance for self-employed Reserve and National Guard members following their release from active duty will be critical to mitigate expenses, secure legal assistance, engage in significant marketing efforts and otherwise minimize the negative effects of the member's mobilization on their small business or practice.

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

Each SBDC will undertake an initiative to identify veterans on its staff. Each SBDC should also encourage development of a veterans' business network and perhaps convene a local summit for veteran business owners and service-connected disabled veterans business owners as well as Reservists and National Guard members who are subject to be called to active duty. Each SBDC will contact its local VA regional office and link its veterans' business network to VA Vocational Rehabilitation Counselors.

Additionally, each SBDC should endeavor to raise the level of awareness to its audiences at small business seminars, conferences and outreach Program Announcements about the needs of veterans and service-connected disabled veterans. SBDCs also should strive to develop close working relationships with their respective State Department of Veterans Affairs to explore collaborative outreach and referrals.

Women's Business Ownership

Each SBDC will make available all of its economic development and technical assistance services to women business owners and prospective women business owners. Both national and local initiatives for women business ownership shall be supported by the appropriate SBDC where it is determined that this assistance is needed. Further, SBDCs will provide support for, coordination with, and referrals to the Women's Network for Entrepreneurial Training (WNET) mentoring program and the Women's Business Centers (WBCs). The SBDCs should develop training programs to help women prepare for the global marketplace.

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

4.0 SBDC CONSULTING & TRAINING SERVICES

All policies and procedures regarding Consulting & Training Services will be found in the Counselors Guide

5.0 SBDC OPERATIONS

5.1 Hours of Operation

The Lead SBDC and Service Centers shall be open to the public throughout the year during the normal business hours of the host institution. In addition, provision should be made to provide evening and weekend assistance, both on-line and in Service Centers, as appropriate to meet local community demands and needs. Anticipated closings shall be included in the annual renewal application. Emergency closures shall be reported to the SBA Project Officer as soon as is feasible. Other SBDC service providers shall be open during the normal business hours of their sponsoring SBDC organization.

5.2 Changes in Points of Communication

SBDCs must notify the Lead Center in writing within 5 days when changes occur in contact information such as physical addresses, telephone numbers, fax numbers, e-mail and web-site addresses.

The Lead Center Director must notify the SBA District Director(s) and the Office of Small Business Development Centers within 10 days when changes occur in contact information such as physical addresses for Lead and service centers, telephone numbers, fax numbers, e-mail and web-site addresses.

5.3 Travel

The travel charged to the Cooperative Agreement must be in accordance with provisions of the grant and utilized in conformance with 13 CFR 130.460(g), and will be used under the same formula for travel reimbursement as provided by the host

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

institution. Award funds are not available for the payment of per diem, lodging, meals or other subsistence expenses associated with local travel. However, award funds may be used to pay transportation expenses for local travel.

Travel to any conference or event located out-of-state/region must be approved in writing by the Lead Center Director. Attendee lists and estimated expenses must be attached to the request. The supporting documentation including, but not limited to, written approval, attendee lists and estimated expenses must be kept on file at the local service center and made available upon request.

Travel funds are authorized for the SBDC State Director and/or his/her designee to attend two Association of Small Business Development Center meetings per year. Travel funds may also be authorized for additional SBDC staff to attend meetings designed for professional development purposes. Further, one trip per year, as approved by the AA/SBDC, is authorized to allow the SBDC State/Region Director and/or his/her designee to meet with national SBA officials to discuss local program initiatives.

Travel outside the United States and its territories which is either: (1) charged to the Cooperative Agreement; or (2) performed while on duty for the recipient organization must be submitted to the District Director who shall submit a recommendation to the AA/SBDC or his/her designee for prior approval on a case-by-case basis. (Travel to be completed using vacation time regularly earned is not subject to approval by the AA/SBDC). Failure to obtain this approval may result in suspension or termination of funding.

5.4 Time & Effort Certification

SBDCs must maintain support documents related to salary and wages for all employees/contractors being compensated through any SBDC funds (federal funds or cash match sources). Recipients and sub-recipients must maintain the appropriate standard per 2CFR Part 200 to document costs for full-time and part-time personnel allocated to the program. This includes, but is not limited to, time and effort certification, appointment letters or contracts, performance reviews, payroll journals and/or activity reports. The records should be incorporated into the official records of the institution.

Time & Effort certifications should be completed no more frequently than monthly and no less frequently than quarterly. Personnel that complete timesheets and indicate on the timesheet time allocated to the SBDC program do not need to complete time & effort certifications. Personnel that are salaried and do not complete time & effort certifications must complete a separate sheet indicated percentage of time allocated to the SBDC program and signed by the employee.

5.5 Private Sector Competition

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

SBDCs should not compete with the private sector and shall make every effort to avoid the appearance of competition with the private sector.

5.6 Standards of Conduct

2 CFR Part 200 require grantees/SBDCs to maintain a written code or standards of conduct that "shall govern the performance of their officers, employees or agents."

The written code or standards must contain statements regarding conflicts of interest and/or any appearance of a conflict of interest and should be directed at covering all SBDC employees and volunteers (See Appendix A for Conflict of Interest Agreement).

5.7 Conflict of Interest Policy

Each SBDC must utilize the SBDC Network's written conflict of interest policy which is disseminated to all employees, consultants, instructors and volunteers working with SBDC clients or client data (See Appendix A for Conflict of Interest Agreement.) The policy includes enforceable elements safeguarding the SBDC program from the actual or apparent conflict that could result from:

- Personal gain, remuneration or pecuniary interest in a past or current SBDC client(s).
- The solicitation or acceptance of any gift, loan, reward, equity in a business, compensation or other monetary remuneration, promise of future employment.
- A compensated recommendation for any goods or services to an SBDC client.
- Soliciting or accepting a compensated position for services which are part of the SBDC network services.
- Disclosing any private or confidential business or personal information to a third party other than SBA without written consent of the client.

5.8 Facility Requirements

The SBDC must establish a principal place of business which is located to provide maximum accessibility and benefit to the small businesses it intends to serve. Facilities must be accessible to the handicapped and have prominent exterior identification as a Small Business Development Center. Facilities must include a reception area, private office space with a separate telephone line and listing from the host. Nearby parking must be available for no cost or for a reasonable fee.

5.9 EEO and Disability Accessibility/Accommodation Requirements:

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

EEO All SBDC services must be provided on a nondiscriminatory basis, and no individual may be excluded from any program because of race, color, religion, sex, age, disability or national origin. Workshops, seminars and conferences must be held in disabled accessible locations. Reasonable accommodation must be made, upon request, for visually and hearing impaired attendees. SBDCs are required to make modifications and accommodations (which do not fundamentally alter the program or activity or entail undue hardship) to enable otherwise qualified disabled individuals to participate. The SBDC network must comply with 13 CFR Parts 112, 113, 117 and 136.

5.10 Program Identification

The specific identification "Small Business Development Center" shall be a part of the name of every SBDC organization within the Orange County/Inland Empire SBDC network. No other name designations or variations will be accepted.

5.11 Disaster Operations Plan

The Lead SBDC and its service centers must have in place disaster plans which are in coordination with the host organization to ensure delivery of services to small businesses in its area of operations, and such plans must be kept on file and available for review by SBA officials. Plans should be reviewed annually by the center directors and updated as needed. SBDCs individually, and in cooperation with SBA and other Federal Agencies as well as State and local entities are encouraged to provide disaster recovery assistance to support impacted small businesses in local economies.

5.12 Legal Services Restrictions

No costs associated (either directly or indirectly) with civil, criminal or administrative litigation are allowable under an award made pursuant to this Announcement. Project funds may be used to pay the cost of non-litigation legal counseling services either to the recipient of this award or project beneficiaries. However, all parties receiving such services must agree in writing to waive any claims of privilege over such services with regard to SBA to the extent necessary for the Agency to perform its monitoring and oversight function.

SBDCs may offer training courses on business law issues, provided that legal topics are presented by individuals qualified by training and experience to address such topics. In furtherance of their educational mission, SBDCs may negotiate arrangements with law schools to offer clients access to supervised student legal clinics that are approved by the state attorney licensing entity. The SBDC must make appropriate disclosures and disclaimers to that effect.

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

5.13 Publication and Postage Requirements

Any publication generated by an SBDC with program funds, whether copyrighted or not, must include an acknowledgment of support by SBA (See subsection 1.9 hereinabove). This includes, but is not limited to, newsletters and training brochures. Moreover, a brief statement indicating that SBDC programs are nondiscriminatory and available to individuals with disabilities must also be included.

Publications produced by the SBDC must promote SBDC services and provide information of direct benefit to the SBDC's local small business community.

Lead SBDCs and SBDC service centers are not authorized to utilize any type of SBA postage franking privilege.

5.14 Contract Compliance/Issue Resolution/Probation

If the SBDC service center is not in compliance with the terms and conditions of their subcontract, the Lead Center Director will initiate a probationary period if she/he believes that the problems are not so severe as to require immediate cancellation of the subcontract.

The Lead Center Director will provide a probation Notice to the SBDC service center via certified mail. The Notice will state that unless appealed by the SBDC service center, the proposed probation will take effect thirty (30) calendar days following the date of the Notice. The Notice will specify the reasons for the probation, the times which must be completed in order for the SBDC service center to be taken off probation, the timelines for completing those items and any reporting deadlines.

The SBDC service center may appeal the proposed probation to the SBA District Office. Any dispute shall be resolved in the manner prescribed and within the time frames stated in the SBDC Regulations (13 C.F.R. Part 130) and the Notice of Award (Cooperative Agreement). Every effort shall be made to resolve disputes at the district office level.

5.15 Small Business Week

SBDCs are encouraged to promote, support, plan, implement and participate in Small Business Week activities in cooperation and coordination with local and national SBA officials. SBDC State/Region Directors and other SBDC personnel, with their strong links to prominent entrepreneurs and small business advocates in their communities, should nominate individuals for Small Business Week awards.

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

5.16 Examinations and Accreditations

As outlined in 15 USC 648(k), biennial program and financial examinations of SBDCs are conducted by SBA's Office of Small Business Development Centers (OSBDC). In addition, an accreditation program is operated by the ASBDC under contract from the SBA. As required by the Small Business Act, the SBA may not renew or extend any cooperative agreement with an SBDC unless it has been approved under the accreditation program. Where a finding of deferral (or denial, if SBA agrees to a short term extension of funding authorization) has been imposed upon an SBDC as a result of the accreditation process, a proposal including a plan of work describing actions to be taken and a timeframe for meeting the specified conditions identified in the denial or deferral must be prepared by the SBDC and provided to the AA/SBDC.

OSBDC and the ASBDC Accreditation Committee will work together to focus on improvements and/or corrective actions resulting from financial examinations and accreditation reviews. The AA/SBDC may waive the accreditation requirement and provide funding to an SBDC upon a showing that the SBDC is making a good faith effort to obtain accreditation.

5.17 Leveraging Resources

SBDC training and/or information materials, developed with SBDC program funds, (such as publications, training guides/materials, outline courses, online tools, web-sites, CD ROMs and videos), will be readily available to SBA for other federal purposes. All such materials will provide appropriate credit to the developing SBDC. A plan for sharing such SBDC generated training and information materials for other federal purposes will be prepared by the SBDC program office in cooperation with the ASBDC and the SBDC Advisory Board.

5.18 Transition Activities

In the event of a recipient organization exiting the program, there are a number of procedures which must be undertaken to ensure a smooth transition to a new recipient organization. These include, but are not limited to:

- Taking an inventory of all property bought with program (both Federal and match) funds including equipment, personal property, supplies, and intellectual property. The inventory should identify each item and describe its funding source (Federal, match), serial number, software installed if computer, acquisition value, current value, date acquired, current location, and current condition.
- Arranging for the transfer of supplies and equipment to the new host or SBA as directed.

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

- Arranging for the transfer of clients documents, including counseling and training files.
- Preparing for the transfer of electronic records as soon as possible, to enable the new host to begin services immediately after the termination date. Allowance is made for the exiting host to transfer data records prior to the termination date.
- Reconciling all accounts for program funds (both federal and match) as well as program income.
- Referring clients requesting services to the new SBDC host upon the termination date, i.e. web page, telephone communications.
- Consistent with the termination of services, transferring the program income fund balance to the new SBDC host at the end of the program period.
- Providing for the submission of final billing as required in the Notice of Award.
- Providing for the participation in SBA closeout reviews including financial documentation.

For a complete list of closeout instructions and activities refer to Appendix M: SBDC Center Closeout Action Plan. The closeout process is based upon the following documents and sources:

- OSBDC Fiscal Review of Closeout, Service Center Monitoring
- SBA Cooperative Agreement
- OMB Circulars A-110, A-133 and A-122
- SBA regulations, 13 CFR, Part 130 including referenced sections 5(b)(6) and 21 of the Small Business Act as amended, 15 U.S.C. 634(b)(6) and 648, and all public laws referenced therein
- SBA regulations, 13 CFR, Part 130
- SBA Program Announcement;
- California State University, Fullerton Auxiliary Services Corporation Contract

5.19 Annual Staff Development Study

In 2011, the SBDC Network developed an annual staff development study to identify apparent trends across the Orange County / Inland Empire SBDC Network. The study is delivered to all network staff through electronic survey on an annual basis. The information in the survey is collected by the Lead Center and all responses will be

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

anonymous. The results of the survey will only be shared in aggregate and by no means will responses be reviewed at the individual level. When budgets allow, the results of this survey will be used to support professional development needs across the network and on a statewide basis. The following questions are part of the survey.

1. What is the best time for you to attend professional development events?
2. Approximately how many professional development events per year would you be interested in attending?
3. How interested are you in each of the following presentation formats?
4. What classification best fits your job duties?
5. Please rate your interest in each of the following Professional Development workshop topics:
 6. I am recognized for my work.
 7. My organization values my opinion.
 8. My organization encourages new ideas (innovation).
 9. My organization welcomes feedback.
 10. The people I work with cooperate and work as a team.
 11. My organization has the right people and skills to do its work.
 12. My organization helps me help my community.
 13. My organization is a good place to work.

Results from the Staff Development Study will be tracked and trended by the Lead Center to promote staff development and satisfaction across the network.

5.20 Neoserra Lockdown

SBA requires that records uploaded to EDMIS be certified annually and, once they are certified, changes are not allowed. To ensure that all records remain historically accurate, the Lead Center locks records (lockdown) to establish parameters that disallow the editing, addition, or deletion of historical records.

Lock down takes place every quarter (The third Friday of January, April, July, and October); please ensure you input all information before lockdown. The report covers fiscal year. If consultants don't input all of their data, it will not be counted by SBA.

There is no way to enter the data after the fact, even if it is in Neoserra because it won't be uploaded to EDMIS.

5.21 A,B,C,D & S Client Stratification Process

Adopted in 2011 from the Michigan State SBDC network, the Orange County / Inland Empire SBDC network utilizes a client stratification document to classify the network's client caseload (See Appendix V Client Potential Assessment [Business Viability]). This stratification document and process facilitates client sharing across the network by

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

defining a common jargon understood and accepted among all network staff. The client classifications are used internally to quickly describe the business stage of development and for reporting purposes, however, the client classification can change periodically as determined by the primary consultant based on work conducted with the client.

5.22 Staff Recognition

In 2011, the SBDC Network created the Staff Recognition Program and Staff Recognition Committee to develop a staff recognition program that reconciles center/regional and consultant/administrative differences and encourages high performance. The committee in its best effort to develop a comprehensive program solicits the guidance of service/lead center directors, consultants, administrative staff, and other state SBDC networks to create and update the Network's staff recognition program.

In 2013 Award Categories & Criterion were updated as follows:

Team Choice Award:

This is a center specific award. Each service center will respond to their respective survey to vote for staff members to recognize under this award on or before November 30. The survey will remain open for a minimum of two weeks. At the closing of the survey, the staff member with the highest number of votes will be awarded from each center.

Excellence Award:

This is a center specific award. Each center director will choose one staff member to recognize for outstanding performance under this award at their own discretion. Information regarding the winner of the Team Choice Award category will be disclosed to each director, however, it is at the discretion of each director to use this information in making the decision for the staff member to recognize.

Money Club:

The top 25% of staff from each center will be awarded based on combined contributions in capital infusion, change in sales, awards and contracts to the center's performance by November 30th. Reports will be run from Neoserra on December 1st to determine the appropriate staff to be recognized.

Job Generator Club:

The top 25% of staff from each center will be awarded based on combined contributions in jobs created and jobs retained to the center's performance by November 30th. Reports will be run from Neoserra on December 1st to determine the appropriate staff to be recognized.

Startup Club:

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

The top 25% of staff from each center will be awarded based on contributions in business starts to the center's performance by November 30th. Reports will be run from Neoserra on December 1st to determine the appropriate staff to be recognized.

Recipients are recognized among their peers at the Network's annual December All-Staff Meeting.

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

6.0 SBDC REVIEW AND REPORTING REQUIREMENTS

6.1 Required Performance Reports

The Local Service Center Director is responsible for submitting via email and hard copy to the Lead Center Director of the following reports on the reported due dates:

<u>Description</u>	<u>Due Date</u>
Annual Renewal Proposal for upcoming year	June 30
Semiannual Performance Report	July 15
Annual Performance Report for the previous year	January 30

6.1.1 Renewal Proposal

The renewal proposal presents the vision for delivering services and advancing the growth of the local service center for the following calendar year. The renewal proposal will serve as the Scope of Work for the service center's subcontract for the following year. The plan should describe the service centers operations and demonstrate how the service center's core services address the specific needs of its local small business community. The renewal proposal should be formatted to the guidelines attached in APPENDIX: T and include, a proposal narrative, a proposal budget, budget narrative, personnel listing, along with a signed CSUF Subrecipient Commitment form signed by an authorized host employee. The renewal proposal is due to the lead center on July 1st of each year for inclusion in the SBDC Network's renewal proposal to the Office of Small Business Development Centers (OSBDC).

6.1.2 Semiannual Performance Report

The SBDC service center should submit an original via hardcopy and email of the Quarterly Performance Report to the Lead Center Director within the due dates as specified hereinabove.

The Semiannual Performance Reports shall contain a listing of the SBDC's major activities and objectives. It should also include a discussion on the progress made toward achieving those objectives.

Activities should be reported in the following sequence, excluding any activities not proposed in the application, and adding any additional categories as appropriate:

100 ADVOCACY

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

Report efforts to represent small business interests within the SBDC's jurisdiction to improve the climate for small business and to contribute to the vitality of the small business sector. Advocacy may include such activities as: public speeches, testimonies before state and/or federal legislatures and small business week activities.

200 CAPITAL FORMATION

Efforts to develop or assist in developing capital for small businesses, e.g., loans, microloans, and grants. This may include developing close linkages with SBICs, SSBICs, venture capital firms, Certified Development Companies (CDCs), and state and local finance programs.

300 INNOVATION AND TECHNOLOGY TRANSFER

Report activities to identify innovation and technology developed by the Federal Government and/or academic organizations having commercial or practical potential and alerting industry and state and local governments to its availability. Also include efforts toward transferring expertise and equipment available from the Federal Government to the private sector. Activities to transfer innovation and technology from business to business, SBIR activities, etc. should also be included.

Activities with the National Institute of Standards and Technology (NIST), and with the Environmental Protection Agency (EPA) for multi-media pollution prevention, Clean Air Act and other environmental assistance activities should also be thoroughly described.

400 INTERNATIONAL TRADE

Report activities to promote increased export by small businesses. Activities will include providing support to Export Assistance Centers (USEACs); evaluating small business firms' export capabilities; assisting with a client's export related financing needs, providing counseling, training and outreach assistance including conducting USEAC E-TAP programs; partnering with public and private sector organizations involved in export development; data base development; match services and market research; and participating in World Trade Week.

500 MINORITY SMALL BUSINESS DEVELOPMENT

Report activities which help minorities participate in the free enterprise system. Activities may include working on Asian American initiatives, Black or African-American initiatives, Hispanic American initiatives, Native American initiatives, Native Hawaiian or Pacific Islanders initiatives, assisting 8(a) clients in the developmental stage and other stages, linking minority clients with other assistance opportunities and conferences.

600 RESOURCE DEVELOPMENT

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

Report activities which promote and/or develop other funding partners to assist the SBDC in its mission. Activities may include recruiting, developing and overseeing private and public resource organizations/individuals for the purpose of providing business development counseling, training and outreach efforts.

700 PROCUREMENT

Report activities which foster opportunities for increasing small business' share of procurement dollars spent by the government and private sector. Activities may include conferences, computer matching services, assistance to Certificate of Competency businesses and prime contractor outreach.

800 SPECIAL EMPHASIS GROUPS

Report activities targeted toward selected groups of entrepreneurs and nascent entrepreneurs. This may include activities that assist people with disabilities, Native Americans, young entrepreneurs, targeted associations, industry groups and other groups identified by SBA and/or the SBDC. (Note: Report minority, veteran and service connected-disabled veteran and women's activities separately under Minority Small Business Development, Veteran and Service Connected-Disabled Veteran Owned Business, and Women Owned Businesses.)

900 ECONOMIC DEVELOPMENT, FAITH BASED AND COMMUNITY INITIATIVES

Report general activities that are not specific to an individual client, do not fit in other categories, and are aimed at supporting/strengthening the economic environment in the SBDC's territory. Areas reported on may include Agri-Business, Rural Development, Community Development, corporate downsizing or plant closing assistance, Convention/Tourism and Incubators.

In addition, report activities aimed toward assisting small business and community economic development organizations. Such activities may include, but is not limited to: providing counseling, training and outreach to community organizations, churches or other such entities who have a significant focus on supporting the needs of small businesses.

1000 RESEARCH

Report research efforts aimed toward assisting small business and economic development. Such research may include but is not limited to database development and needs analysis.

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

1100 OTHER ACTIVITY

Activities which do not fit in the categories above. The activities may include dissemination of basic business information as well as any specific information requested by the SBA Project Officer and mutually agreed upon with the SBDC State Director.

1200 SUCCESS STORIES

Report at least three examples of assistance provided in which tangible results occurred. Include a description of the business, the problems encountered, the assistance provided, the resources used, and the actual or expected results including economic impact. A signed statement from the success story client(s) of his/her consent for use of the success story by SBA must be kept on file. (See Success Story Writing Guide in Appendix I.)

1300 TRAVEL

Provide a description of any unplanned or unbudgeted out-of-state travel for Lead and service centers not disclosed in the cooperative agreement.

1400 PROBLEMS

Provide a description of any and all problems that have significant impact on the program or program objectives.

1500 FINANCIAL REPORTS

Furnish copies of SF-269 and SF-272, SBA Form 2113 and any requested attachments as required.

1600 WOMEN-OWNED BUSINESSES

Describe activities targeted to women-owned small business, such as the Women's Network for Entrepreneurial Training (WNET) program, cooperation with the Women's Business Centers, and any seminars or specialized consulting approaches.

1700 ECONOMIC IMPACT

Provide the economic impact generated from the assistance you have given your clients during the budget year using the following format:

Customer Satisfaction: _____%

Business Start-ups: _____

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

Start-Up firms remaining in business after one year _____

Jobs: Created # _____
 Retained # _____

Sales: \$ _____

Taxes: State \$ _____
 Federal \$ _____Loans: SBA # _____ \$ _____
 Non-SBA # _____ \$ _____

Non-Debt Financing \$ _____

1800 VETERAN AND SERVICE CONNECTED-DISABLED VETERAN -OWNED
BUSINESSES, RESERVISTS ON ACTIVE DUTY AND OTHER RESERVE
COMPONENT MEMBERS OF THE U.S. MILITARY

Describe activities targeted toward veteran and service connected-disabled veteran owned businesses, as well as Reservists and National Guard members called to active duty, such as: Veteran Entrepreneurial Training Programs, summits for veteran business owners, activities in conjunction with the Department of Veterans Affairs Vocational Rehabilitation and Employment Services, Employer Support of the Guard and Reserve (E.S.G.R.) and National Guard State Adjutants, DELTA Program, base closing and RIF counseling.

1900 MANUFACTURING

Report activities related to providing assistance to manufacturing companies or their employees, including displaced manufacturing workers. Include all efforts and support to troubled companies, companies challenged by foreign competition, NAFTA and foreign labor alternatives. Also include activities related to cooperation efforts with other local organizations or government units concerned with manufacturing issues, including, but not limited to, the National Institute of Standards and Technology's (NIST) Manufacturing Extension Partnership (MEP) Program.

2000 ONLINE ACTIVITY

Report activities and accomplishments which demonstrate use of web-based technology to enhance direct client service delivery. This would include the use of online counseling (e-mail and real-time) and training, online expert systems or diagnostic tools to identify needed services, audio or video streaming, electronic

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

registrations and scheduling, webinars, and other targeted uses of the Internet to facilitate delivering information to clients more cost effectively.

6.1.3 Annual Performance Report

The SBDC service center must provide an original via hardcopy and email of the annual programmatic report to the Lead Center Director within 30 days of completion of the previous budget year. This report should be in the same format as the quarterly report and should represent the consolidated effort of the entire SBDC service center, including satellites. Third and fourth quarter information should be included as necessary.

Failure to submit this report accurately and in a timely manner could jeopardize future funding.

The Annual Performance Report should include the following:

- (A) An overall summary of the activities reported in the semiannual report including a description and explanation of objectives in the Cooperative Agreement that were met or exceeded, as well as an explanation of those objectives not fully met;
- (B) A description of any new resources developed by the SBDC;
- (C) Overall observations, difficulties encountered, and recommendations for improving SBDC services; and
- (D) Economic impact data, e.g., jobs created, tax dollars generated; and
- (E) Number and description of informational services, requests and referrals received by the SBDC network that do not count toward consulting and training. This may include telephone assistance, electronic assistance, or any other assistance with a duration of less than one hour.

6.2 Annual Reviews

The SBA Project Officer and Lead Center Director will conduct simultaneous reviews of each service center on at least an annual basis. The review will cover all aspects of consulting, training, file management, and financial management and documentation. Each service center director shall receive at least fourteen (14) days notice prior to the review date.

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

6.3 Examinations and Accreditations

As outlined in 15 USC 648(k), biennial program and financial examinations of SBDCs are conducted by SBA's Office of Small Business Development Centers. A certification program is currently operated by the Association of Small Business Development Centers. As required by the Small Business Act, the SBA may not renew or extend any cooperative agreement with an SBDC unless it has been approved under the certification program. Where conditions have been imposed as a result of the certification process, a proposal including a plan of work describing actions to be taken and a timeframe for meeting the specified conditions must be prepared by the SBDC. The AA/SBDCs may waive the certification requirement upon a showing that the SBDC is making a good faith effort to obtain certification.

7.0 SBDC FINANCIAL REQUIREMENTS AND PROCEDURES**7.1 Budget Period and Categories**

Each service center's federal budget is on an annual (calendar year) basis. The following are the budget categories for reporting of Orange County/Inland Empire District SBDC network expenditures and cost sharing match:

Personnel:	For each position of the SBDC, show Federal, Match, Annual Salary, Number of months, Level of Effort in Percentage, and Total Amount used as the basis to estimate personnel costs. For key personnel, list name and position title. For SBDC employees who are not key persons or personnel to be hired only position title is required.
Fringe Benefits:	Show fringe rates for full-time and part-time staff. Do not include fringe cost in the total amount required for personnel.
Travel:	Provide purpose for in state and out of state travel. For local travel not requiring preauthorization provide total anticipated mileage and mileage rate. For travel requiring preauthorization, itemize destinations, mode of transportation, airfare or other transportation rates, number of trips, and number of travelers. Prior approval of the SBA is required for foreign and unplanned out-of-state (not in approved budget) travel.
Equipment:	List items costing \$5,000 or more. The recipient organization must maintain an inventory including cost and detailed description of each item. Equipment inventory must be made available upon request of the SBA.
Supplies:	Show anticipated cost of supply items such as general office, operational, computer supplies, and other supply items costing less than \$5,000. The recipient organization must maintain an inventory of controlled supplies of higher dollar value or high potential for loss such as projectors, cell phones, furniture, etc., and it must be made available upon request of the SBA.
Contractual:	Should service center propose sub-contractual cost, please provide budget details, such as statement of work, number of hours and rate of pay. Separate budgets (i.e., form 424A and budget justifications) are only required for Lead Center subcontracts with individual service center. Do not show indirect cost on contractual line. Service Center indirect cost must be shown on line j column 4 of the 424A.

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

Consultants:	There may be an error on form 424A showing "construction" instead of "consultants" category. Please indicate consultants cost on that line for construction. Specify the consultant's purpose and indicate the number of hours and rate of pay.
Other:	This category may include, but is not limited to computer software, copying, postage, printing, publications, subscriptions, dues; telephone, conference fees, and office space (indicate square footage).
Indirect cost:	Indicate the indirect cost amount on budget justification line j and 424A, line 6j. Show indirect cost rate and method used to calculate indirect cost. You may obtain the Indirect Cost Allocation Worksheet from the SBDC website at www.sba.gov/sbdc . You may break out Lead Center Indirect vs. Contractual (Service Center) Indirect on line 23, Remarks. A copy of the Indirect cost rate agreement (ICR) approved by your cognizant agency for audits must be provided, including the signature page of the agreement to support indirect charges. The same rate approved under the ICR must be used to calculate indirect cost. Cash match does not include indirect costs, overhead cost or in-kind contributions. If the Lead or service center does not have an indirect cost rate agreement, please contact the Project Officer at the SBA District Office.

7.2 Budget Preparation

Budget proposals for the upcoming funding period must be submitted with the Annual Business Plan no later than July 1 of the current year and are subject to modification and approval by the Lead Center Director.

7.2.1 Lobbying and Membership Dues

There is a broad federal restriction on all grantees of the federal government, which prohibits the use of federal appropriated monies to lobby Congress or agencies concerning certain specified federal actions. 31 U.S.C. § 1352 (also known as the Byrd Amendment). In addition, OMB cost circulars (A-122 at §25 and A-21 at §24) provide that the use of grant funds for lobbying activities are generally unallowable costs. Reference should be made to the OMB Circulars, which set forth the unallowable activities as well as the limited activities that are allowed.

The use of grant funds to pay the costs of organizational membership in business, technical and professional organizations, including the ASBDC, are allowable expenses. However, dues paid with federal, matching, or program income funds cannot be used, directly or indirectly, for lobbying activities prohibited by the Byrd Amendment or the OMB Circulars. The only source of funds, which SBDCs may use to pay that portion of membership dues allocated to lobbying, is overmatch (other funds not declared as match). SBDCs must be able to document the source of any funds used for lobbying, whether directly or indirectly through dues.

7.2.2 Justification of Costs

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

All proposed costs require justification and narrative explanation.

7.2.3 Subcontracting

No subgranting is allowed. All subcontracting awarded as a result of this Agreement will be in accordance with OMB Circular A-110, Subpart C - Post Award Requirements, Procurement Standards; and/or 13 CFR 143.36 and 13 CFR 143.37.

7.3 Procurement Standards

All procurement transactions shall follow host policy, and be conducted in a manner to provide, to the maximum extent practical, open and free competition. Positive efforts shall be made to utilize small businesses, minority-owned firms, and women's business enterprises, whenever possible.

Any transaction for goods or services for an amount in excess of \$5,000.00 shall require an open bidding process, with a minimum of three (3) proposal submissions unless stipulated differently in written host policy. The proposals shall be submitted to the Lead Center for review and approval prior to award.

7.4 Budget Modifications

Budget modifications are allowable as follows:

- 1) Modifications for object cost category changes in excess of ten percent (10%) of the service center's budget may be made once per calendar year.
- 2) Additional variations for either increases or decreases in cash match or in-kind funds, regardless of amount, shall be submitted for written approval by the Lead Center Director or designee.
- 3) All requests for modifications to the approved budget shall be submitted in writing to the Lead Center Director or designee and must include an SBDC Budget Modification Form. The Lead Center Director or designee shall, within fourteen (14) working days from the date of receipt of the service center director's written request, provide the service center director with a written approval or disapproval of the request.

No requests for variations shall be submitted to the Lead Center after November 1 of the current funding year. Requests for modifications submitted after this date are automatically disapproved.

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

7.5 SBDC Payment Request and Expenditure Summary

California State University Fullerton Auxiliary Services Corporation reimburses centers for expenditures of federal funds allocated through the Lead Center on either a monthly or quarterly basis, depending on the individual center's subcontract. In no event shall the SBDC service center request reimbursement for obligations entered into or for costs incurred prior to or after the current funding period.

SBDC service centers must submit the monthly/quarterly Invoice, including those for federal, cash, in-kind and program income, detailed ledgers for the same period, as well as all supporting documentation for reported matching funds.

Federal and Cash Match expenditures must be kept in separate accounts and clearly identifiable.

7.6 Cash/In-Kind Match Requirements

The SBDC network must provide matching funds equal to the total amount of Federal funding received. No less than fifty percent of the required contribution will be in cash. This cash outlay must not include indirect costs, in-kind contributions, or program income derived from activities supported in whole or in part with Federal or match funds. Direct cash match committed by the Lead Center or service center (i.e. personnel services, fringe benefits, consultants) may be included in the cash match only to the extent that these costs were committed as part of the specific direct line item costs verified by the Certifying Representative prior to funding.

Further, the cash match shall not include: (1) funds contributed from other Federal sources [see exception below]; (2) program income or fees collected from recipients of assistance, whether collected by the Lead SBDC, service centers or any other participants in the SBDC network; or (3) amounts committed by the SBDC network for unidentified and/or contingent costs in the budget proposal.

There is one exception to not allowing Federal funds as cash match. Community Development Block Grant (CDBG) funds received from the Department of Housing and Urban Development are allowed when: (1) the SBDC activities are consistent with the authorized CDBG activities for which the funds were granted; and (2) the CDBG activities are identified in the Consolidated Plan of the CDBG grantee or in the agreement between the CDBG grantee and the subrecipient of the funds.

The cash match must be committed up front and identified by source, amount, and account number in the SBDC budget proposal. In addition, the contributors, requirements, specifications, or deliverables must be clearly identified in the proposal. The cash match account (as well as SBA Federal Funds) allocated to the SBDC Program, must be under the direct management of the Orange County/Inland Empire

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

Lead Center or service center Director. However, SBDC organizations are not required to establish separate bank accounts solely for SBDC purposes. The availability of this cash contribution for SBDC Program operations must be certified by the official from the applicant organization who signs the Federal Assistance Form (SF-424).

Match must be expended in accordance with SBDC program requirements and applicable OMB Circulars.

If the state is providing part of the cash match, the Certifying Representative must verify that these funds have been appropriated prior to award of the Cooperative Agreement. However, in situations where state appropriation cycles prohibit total compliance prior to award of the Cooperative Agreement, the Certifying Representative shall verify that sufficient upfront cash match will be available from the state or other sources, prior to any withdrawal of Federal funds.

In-kind match must be reported on at least a quarterly basis on the monthly/quarterly Invoice and must be received with all supporting documentation. Supporting documentation includes signed affidavits which verify amounts of in-kind contributions. (See In-Kind Affidavit, Instructions, and In-Kind Valuation Schedule in Appendix J.)

Support for in-kind costs (Contributions, when used as match, must be documented showing the name of donor, phone number, signature of donor, date of donation, justification of the value of goods or services {hours with labor rate of services} and narrative description of service provided or item donated.) OSBDC has implemented the following policy regarding in-kind contributions:

- Contributions may include, but are not limited to, cost items such as time and materials, office space, and equipment.
- A bona fide contribution exists and may be claimed when the source of the donation has no reasonable expectation of compensation such as a requirement that the contribution be made as a provision in a contract or purchase order for the products or service.
- Paid SBDC staff, i.e. host employees, are not eligible sources of in-kind contributions over and above the remuneration of salaries and benefits provided by the host organization.
- SBDC support documentation must include the following: dated and signed statement from the donor identifying the specific nature of the donation, contact information, and indicating that no additional remuneration is expected. Donor documentation may resemble an invoice with those provisions.
- The SBDC must document the annual basis for valuing the donation in a clear manner such as the following: 3 bids or quotes in response to a competitive procurement process for similar cost items; sales literature, price catalogs; published schedules; or documented pricing for similar cost items previously paid for by the host institution.

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

- The total value of paid and donated services from each donor must represent a reasonable value to the government and be consistent with the procurement policies and standards of the host institution.
- Indirect costs are not allowable for cash match. Waived indirect shall be calculated as a non-cash match item.

In order to comply with the requirements stated above and in the program announcement, the Orange County/Inland Empire SBDC Network has adopted the following In-Kind Contribution Valuation Schedule into the SBDC Network Policies and Procedures and is updated annually. The following in-kind valuation schedule shall be used in conjunction with the In-kind Affidavit form to claim contributions of in-kind match to the SBDC network program in lieu of additional supporting documentation to adequately value the contribution, such as; three bids or quotes in response to a competitive procurement process for similar cost items; sales literature, price catalogs; published schedules; or documented pricing for similar cost items previously paid for by the host institution.

7.7 SBA Requirement for Allocation of Federal Funds

SBA requires that at least 80 percent of Federal dollars provided through the Cooperative Agreement must be allocated to the direct costs of the program.

7.8 Carryover Requests

The Lead Center Director may request approval to carry over a Federal unobligated, unexpended balance to the next budget period to make it available for spending during the next period. Carryover of unexpended funds is permissible only if funds are to be used for a non-recurring, non-severable project or activity within the scope of the SBDC program.

Carryover requests must consist of the following: (1) SF-424, budget pages, and justification; (2) narrative indicating why the funds were not expended during the period in which they were awarded; (3) SBA District Office approval; and (4) evidence of match.

The match requirement for carryover funds can be met by using unexpended overmatch from the current budget year, an increase in funds pledged by the SBDC, or overmatch from the year funds were carried over from or a combination of both.

A carryover request must be made at the time of submission of the final SF-269 (no later than 90 days after the end of the budget period) or the de-obligation process will begin. Approved carryover requests require the issuance of a revised Notice of Award. The Lead Center must document that carryover funds are spent to support the activities outlined in the carryover request.

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

Carryover funds must be accounted for separately from Federal and Cash Match expenditures.

7.9 Program Income

Program income must be used to further the objectives of the SBDC program and cannot be used for other purposes by centers while participating in the SBDC program or after leaving the SBDC program. SBDCs must expend any program income which exceeds 25 percent of the SBDC's total budget (SBA federal funds and matching funds) by year end. Any remaining program income may be carried over to subsequent budget periods to be utilized to further program objectives. SBDC Program recipients are responsible for establishing a separately identifiable program income account to facilitate financial reporting. All program income must be reported on SBA Form 2113 (Program Income Report). The SBDC will include as an attachment to the SF-269 the SBA Form 2113 and a narrative description of how program income was used to further eligible program objectives.

7.10 Contract Close Out Package

The following general guidelines on closing out contracts are provided to assist SBDC service center directors in establishing systems to ensure contract compliance, expedite, the close-out process, document successful completion and close the contract file in a manner that will provide an audit trail.

Below is a listing of the required documentation for the close-out of a contract:

- A. A final invoice of all expenditures for the contract period. This final invoice must agree with the final budget.
- B. A revised budget (if necessary) reflecting actual expenditures using the Budget format.
- C. A narrative on the accomplishments achieved through the contract funding, special projects completed, milestones achieved by category and any other highlights of the service center's performance for the contract period.
- D. Detailed inventory list of SBDC property. This list should include: furniture, equipment, computers, software, telephone systems, copy machines, etc. with a purchase price/value in excess of \$500 and listed in a format consistent with Appendix R SBDC List of Equipment & Other Property.
- E. List of all SBDC equipment. All items purchased with SBDC funds (federal, cash match or in-kind donations) remain the property of the SBDC program. Inventory must be tagged with labels. Inventory lists must be kept current and may be requested at any time.
- F. Required reports (i.e. Quarterly, Special Projects, etc.)

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

7.11 Miscellaneous Financial Requirements & Procedures

Additional guidance related to financial requirements pertaining to sponsorships, events, Faculty, and Clients is listed below.

Sponsorships:

Per OMB Cost Principles at 2 CFR 220, Appendix A, J. 15, the SBDC cannot sponsor or be perceived as a sponsor of an event. Sponsorships are unallowable expenses under OMB guidelines. The SBDC can purchase a table at an event that provides professional development training for staff and is in alignment with the network's strategic plan. Seating priority will be given to SBDC staff within the SBDC network.

Events:

The costs of meetings and conferences, the primary purpose of which is the dissemination of technical information, are allowable. This includes costs of meals, transportation, rental of facilities, speakers' fees, and other items incidental to such meetings or conferences per OMB-A21 Section J, 32. Meetings & Conferences.

The SBDC may host an event in partnership with other organizations as long as the SBDC is seen as the primary host of the event with prominent logo placement, along with shared costs and contribution by partners and sponsors involved in the event. The burden of expenses shall not be placed on the SBDC to pay for the entire event.

Working with Faculty:

If the SBDC needs specific work done that a faculty member can execute for the SBDC, the SBDC will pay equal to the faculty member's hourly/salaried rate and no more than that rate- Any amount greater than the faculty member's base rate of pay for their primary assignment is unallowable.

The SBDC network is required to ensure that effort expended on sponsored activities is certified. The effort reporting system assures federal sponsors that salaries and wages are consistent with the effort devoted to the projects they sponsor. Thus, the faculty member must provide time and effort forms with the dates and times equal to the time spent on the project. The SBDC will not pay the faculty member if time and effort forms and dates do not match the effort and date range spent to complete the project.

Clients:

The SBDC cannot be perceived as investing in anyway in a client's business. This includes: purchase of or gifting of services, admission to an event, purchasing of a meal for the client, etc.

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

7.12 Region Office Financial On-Site Reviews

Per the terms and conditions of this award, the California State University Fullerton-Auxiliary Services Corporation (CSUF-ASC), as the recipient of a federal award from the U.S. Small Business Administration, is required to monitor its sub-awards and to provide administrative oversight. Records and documentation pertaining to this award are required to be maintained for review for up to three years after the close of a grant year. The purpose of the review by the CSUF-ASC is to locate any problematic areas so that they may be corrected. If unallowable expenditures are noted during the review, adjustments in invoicing will be required. It is assumed that each service center's host institution is familiar with the relevant federal regulations and the specifics of the contract issued by CSUF-ASC to them, and that appropriate systems are in place to ensure compliance with all applicable regulations and requirements.

The Director of the Office of Sponsored Programs or his/her designee will typically perform all on-site reviews. The financial review consists primarily of the review of expenditure documents, including payroll records, and host financial statements as provided by the center, for both federal and match expenditures. Program income accounts will also be reviewed, as will policies and procedures on procurement, travel, cash handling, property management, and time and effort systems. Interviews will be conducted with various personnel who prepare service center invoices, initiate and/or approve expenditure documents, perform bookkeeping functions, or review and approve invoices submitted to CSUF-ASC for reimbursement. This may include personnel at the host institution's central administration level who are involved in the preparation of the center's invoice, so those individuals should be available during the review. (See in Appendix J.)

Subrecipients will be reviewed using as standards the requirements of the OMB Circulars applicable to all subrecipient awards under the SBA award to CSUF-ASC, and the terms and conditions of the subrecipient agreement.

1. The Director of the Office of Sponsored Programs or her designee will then perform the following activities using financial records provided by the center under review:
 - 1) comparison of budgeted expenses to actual expenses,
 - 2) review of selected expenditure source documentation, including payroll and paid benefit documentation,
 - 3) comparison of invoice amounts to federal and matching expenditure source documentation, as well as to institutional financial records,
 - 4) re-calculation of certain total figures, indirect costs if applicable, re-budgeting percentages, and other calculations;

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

- 5) review of any in-kind match documentation,
- 6) review of institutional documents such as indirect cost agreements and proposals, general ledger account summaries and transaction listings, property inventory listings, and time and effort reports, written administrative policies as exist.
- 7) review of program income records to amounts reported to CSUF-ASC, and
- 8) interview personnel to determine systems and internal controls.

2. Standards of Comparison. Specifically, all federal and matching account expenditures and/or accounting entries for the selected months are reviewed for comparison to the following standards:

- 1) **Invoice amounts** coincide with institutional financial statements (disbursement records).
- 2) **Federal funds** are established in a separate account under the direct control of the director, and are not co-mingled with any other project activity.
- 3) **Matching funds** are established in a separate account under the direct control of the director, and are not co-mingled with any other project activity, or are established in the same account with federal funds for the SBDC, separate from any other project activity.
- 4) Account **reconciliations** are performed routinely to ensure only authorized expenditures were posted to SBDC ledgers.
- 5) **Budget classifications** used are correct and re-budgeting is within the 10% allowed.
- 6) **Salary charges** match time and effort records, timesheets, and institutional payroll disbursement records.
- 7) **Leave reports** are generated and reconcile back to leave requests.
- 8) **Time and effort** documents meet OMB cost circular requirements, including frequency and appropriate certifications.
- 9) **Expenditures comply** with OMB cost circulars – Section J.
- 10) Clear **description and benefit** is evident on expenditure source documents.
- 11) **Cost splits** between accounts, if done, are reasonable.
- 12) **Travel** requests are approved in advance by the supervisor, reimbursements are approved by the supervisor and include the purpose and benefit of the travel; **Mileage logs** include the purpose and benefit of local travel as well as destination information for mileage verification purposes.
- 13) **Source documents** reflect that expenditures are approved by the center director.
- 14) Expenditures are within the **proper budget period**.
- 15) **Fringe benefits** are supported by institutional documentation.
- 16) **Long distance records** are certified as being business related and reconcile to charges on ledgers.
- 17) **In-kind matching** documentation, if applicable, fully supports reported amounts, are reasonable, the depreciated amount of equipment has not been exceeded, and items are not duplications of costs included in negotiated indirect cost

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

- calculations (where one exists).
- 18) **Program income** is established in a separate account under the direct control of the center director; that accounting records reflect revenue, expenditures and balances reported to the UH; and that procedures exist to ensure all revenue is received by the SBDC; and that fund balances are made available to the center director at the beginning of each fiscal year.
 - 19) **Property management** system complies with OMB administrative circulars and a spot check of physical inventory is successfully completed
 - 20) **Equipment** purchases were approved either in the proposal budget or by letter from the CSUF-ASC.
 - 21) Where applicable, the latest **indirect cost** proposal is available for review to review for duplication of costs between direct and indirect.
 - 22) Host institution **written policies** for compensation, travel, purchasing, cash handling and property management are adequate to ensure appropriate administrative oversight of program funds and that those policies and procedures are enforced.

After the completion of the review, the Director of the Office of Sponsored Programs or her designee, will discuss any issues or concerns with the center director. A report of finding and recommendations will be issued to the center director. Some findings may need correction at the institutional level. In this case, the center director should distribute the report to all appropriate personnel for review. The center director should respond to the findings as listed in the center financial review report (unless no findings were made), providing a timetable for resolution of all issues cited in the report.

Center Directors are encouraged to contact the Director of the Office of Sponsored Programs or her designee, regarding questions or procedures of a financial or administrative nature at any time

Cost allowability as applied to the CSUF-ASC Small Business Development Centers as established under a Federal program funded by the US Small Business Administration under 2 CFR Part 200:

Allowable Direct Costs

Advertising-personnel recruitment
Advertising-procurement of goods/services
Communications costs-long distance
Compensation for personal services
Equipment-special purpose (qualified)
Fringe benefits
Insurance (qualified - some IDC)
Maintenance and repair costs
Material Costs-supplies and fabricated parts
Professional activities-meetings/conferences
Subscriptions-business/professional
Patent costs
Professional Services
Rearrangement and alteration costs
Reconversion costs

Unallowable Direct Costs

Advertising-convocations
Advertising-promotional items
Advertising-promote the institution
Alcoholic beverages
Alumni activities
Bad debt
Civil defense
Coffee Bar Expenses
Commencement
Contingency contributions
Defense or prosecution costs-criminal or civil-
(qualified)
Depreciation / use allow (norm. IDC)
Donations and Contributions-value
Employee morale, health, welfare (norm IDC)

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

Recruiting costs
Rental costs of buildings and equipment (qualified)
Royalties (qualified)
Sabbatical leave costs (qualified)
Severance payments (qualified)
Specialized service facilities (qualified)
Taxes
Transportation costs
Travel costs (qualified)
Termination costs of agreement (qualified)

Entertainment
Fines or Penalties
Goods or service for personal use
Housing and personal living expenses
Interest, fund raising and invest mgmt costs
Labor relations costs (normally IDC)
Lobbying
Losses on other sponsored agreements
Memberships-civic or community org.
Memberships-social or dining club
Promotional items – T-Shirts, mugs
Proposal Costs -(normally IDC)
Scholarships and student aid costs
Student activity costs
Trustees - travel or subsistence
Water Coolers/Bottled Water for offices

Allowable as a Direct Cost-Major Program (normally treated as an indirect cost)

Communications - local telephone costs
Memberships-professional organizations
Office supplies
Postage

May be allowable as a Direct Cost - if included in proposal only or prior approved by SBA

Advertising-costs of displays/exhibits (qualified)
Advertising-costs of meeting rooms (qualified)

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

8.0 RECORDKEEPING REQUIREMENTS

All SBDC applicants and their service centers will be required to maintain complete and accurate records and supporting documentation to facilitate a thorough program audit. All significant client counseling, training and other activities shall be fully documented. SBDC applicants will support SBA's required data collection and reporting system.

In addition to the performance, financial, and program reports already mentioned in this announcement, you must maintain the following reports:

8.1 Counseling Activity Reports

All SBDCs are required to collect the information currently requested on SBA Form 641 or an equivalent form that supports SBA's management information database.

They are also required to adhere to the following:

Compliance with legislation passed by the Congress and Executive Orders issued by the President, Federal executive agencies, including the Small Business Administration (SBA). Regulations and policies implementing these laws and Executive Orders can be found in Title 13, Code of Federal Regulations (CFR), Chapter 1, or SBA's Standard Operating Procedures (SOPs). In order to provide the required notices, the following is a brief summary of the various laws and Executive Orders that affect SBA's entrepreneurial development programs.

Paperwork Reduction Act (44 U.S.C. § 3501)

SBA is collecting record keeping information on form OMB 83-I in order to facilitate business assistance services to its clients and for agency analyses related to the operation and management of the entrepreneurial development programs. Periodically, the SBA may use the information collected on this form to produce summary reports for program and management analysis, as required by law. SBA also intends to use the individual client data to select participants for follow-up surveys designed to evaluate SBA assistance services.

PLEASE NOTE: The estimated burden for completing this information is 3 minutes. Your responses to the requested information are voluntary under these programs. You are not required to respond to the questions on this form if it does not display a currently valid OMB control number. If you have questions or comments concerning any aspect of this information, please contact the U.S. Small Business Administration Information Branch, Washington, DC 20416 and/or Desk Officer for the Small Business Administration, Office of Management and Budget, Office of Information Regulatory Affairs, 725 17th St., NW, Washington, DC 20503.

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

Privacy Act (5 U.S.C. § 552)

Any person can request to see or get copies of any personal information that SBA has in the requestor's file, when that file is retrieved by individual identifiers, such as name or social security number. Requests for information about another party may be denied unless SBA has the written permission of the individual to release the information to the requestor or unless the information is subject to disclosure under the Freedom of Information Act.

Note: Any person concerned with the collection, use and disclosure of information, under the Privacy Act may contact the Chief, Freedom of Information/Privacy Act Office, U.S. Small Business Administration, Suite 5900, 409 3rd St, SW, Washington, DC 20416 for information about the Agency's procedures relating to the Privacy Act and FOIA.

Freedom of Information Act (5 U.S.C. § 552)

This law provides, with some exceptions, that SBA must supply agency records, (i.e., information in its files and records) to a person requesting it. This generally includes statistical data on SBA's business assistance programs, which are in the aggregate. SBA does not routinely make available a client's proprietary data (without first doing pre-notification, as required by Executive Order 12600), or information that would cause competitive harm or constitute a clearly unwarranted invasion of personal privacy.

Address a request under this Act to the appropriate SBA office and identify it as a Freedom of Information Act request. For information about the Freedom of Information Act, contact Chief, Freedom of Information/Privacy Act Office, U.S. Small Business Administration, 409 3rd St., SW, Suite 5900, Washington, DC 20416.

Agreement:

"I request business management counseling from a Small Business Administration resource partner, the Small Business Development Center. I agree to cooperate should I be selected to participate in surveys designed to evaluate SBA assistance services. I understand that any information received by an SBA resource partner counselor will be held in strict confidence by the counselor to the extent allowable by law.

I further understand that SBA resource partner counselors have agreed not to:
(1) recommend goods or services from sources in which the individual counselor has an interest; and (2) accept fees or commissions developing from any SBA

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

resource partner counselors. In consideration of the provision of management and/or technical assistance by a resource partner counselor, I agree to waive all claims arising out of this assistance, against SBA personnel, the resource partner from whom I sought assistance, its host organizations, and the counselor(s) arising from this assistance."

These forms shall be retained in accordance with current OMB and SBA requirements.

SBDCs are responsible for reporting all counseling activities on SBA Form 1062, "Business Development Counseling Record," or SBA Form 641, "Counseling Information Form" or an equivalent form that supports SBA's management information database. Copies of these forms must be retained at the SBDC and available for review by the SBA. An electronic version of these forms may also be used as long as the data elements are the same.

8.2 Training Activity Reports

SBDCs utilize SBA Form 888, "Management Training Report" or similar program developed form to report small business management training activities. The SBA Form 888 should be prepared by the SBDC when the SBDC is responsible for managing a training activity. SBDCs may use a computerized version of this report.

Reporting Co-hosted (Collaborative) training:

When reporting training numbers for a co-hosted training, the hosts (SBA and ED resource partners) must work together to determine how to equitably divide the number of clients among themselves. Double counting of clients is not permitted.

Examples involving multiple resource partners contributing to a single training event:

- A) If each resource partner contributes a significant amount of presentation time (defined as one hour or more per partner), then each host could count all attendees.

Accordingly, if five partners co-hosted a training event with five hours of total presentation time (each partner delivering training for at least one hour) and fifteen persons attended the event, each partner could count fifteen persons trained for one hour each.

- B) If each partner puts in less than one hour (per partner) of presentation time, the attendee count would be divided among the hosts based on mutual agreement.

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

Accordingly, if five partners co-hosted a training event with 1.5 hours of total presentation time (each partner delivering training for less than one hour) and fifteen persons attended the event, the partners would negotiate how to divide the number of attendees (e.g., each partner could count three persons trained for 1.5 hours).

Reporting Training with Multiple Sessions (Temporary Operating Definition for FY2007):

Each session of a multiple-session training program or course may be counted as an individual course on SBA Form 888. Sessions must correspond with the minimum training duration identified in the definitions listed above.

SBDC's will submit all training information from the SBA Form 888s or equivalent form quarterly to SBA's EDMIS2 system.

The list must be certified with the signature of the State/Region Director. The SBA Form 888 or similar program developed form must be maintained at the SBDC for review by the SBA Project Officer.

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

APPENDIX A: Conflict of Interest Agreement

CONFLICT OF INTEREST POLICY AND AGREEMENT

Part A

Revised May 18, 2012

Regulations of the United States Small Business Administration (SBA) set forth the basic requirements for conflict of interest policy. With regard to Small Business Development Centers, it is stated in 13 CFR 130.330 that "The Lead Center and other SBDC service providers must have a conflict of interest policy applicable to their **SBDC consultants, employees, instructors and volunteers.**"

Further guidance with respect to conflict of interest policy can be found in the SBA Program Announcement for Renewal of the Cooperative Agreement for Current Recipient organizations. It is stated in the announcement that:

"Each SBDC network must have a written conflict of interest policy which is signed annually by all employees, consultants, instructors and volunteers of the SBDC network. The policy must include enforceable elements safeguarding the SBDC program from the actual or apparent conflict that could result from:

- Personal gain, remuneration or pecuniary interest in a past or current SBDC client(s).
- The solicitation or acceptance of any gift, loan, reward, equity in a business, compensation or other monetary remuneration, promise of future employment.
- A compensated recommendation for any goods or services to an SBDC client.
- Soliciting or accepting a compensated position for services which are part of the SBDC network services.
- Disclosing any private or confidential business or personal information to a third party other than SBA without written consent of the client."

Each SBDC Network has a responsibility to establish a conflict of interest policy that is acknowledged and signed **each year** by employees, consultants, instructors and volunteers. Likewise, each consultant and each client must sign a Form 641 Counseling Information Form.

In order to comply with the requirements stated in the regulations and program announcement, the Orange County / Inland Empire Lead Small Business Development Center has adopted the following policy into the SBDC Network's Policies and Procedures. With regard to Standards of Conduct, the Lead Center policy states that "Each SBDC must have a conflict of interest policy which is disseminated to all employees, consultants, instructors and volunteers of the SBDC network with access to confidential client information through the SBDC client activity tracking system known as WebCATS."

By signing this Agreement, SBDC staff and volunteers with access to confidential client information through the SBDC client activity tracking system known as WebCATS (collectively "Personnel") agree to be bound by the following terms and conditions:

- Personnel shall not enter into any agreement, contract, or partnership with any SBDC active client, inactive SBDC client, or Affiliated Entity for a period of 90 days

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

from the date the client ceases to be an active client (the "Restricted Period"). An Affiliated Entity is defined as an entity in which a client, an entity controlled by client, or a family member of client holds more than 20% ownership or control. In the event a client wishes to engage with a SBDC consultant prior to the end of the Restricted Period, Part B of the Conflict of Interest Policy and Agreement form must be completed and submitted to the Regional Director for review and approval. The Regional Director will review and approve/disapprove requests on a case by case basis.

- Personnel are prohibited from deriving any personal financial gain, remuneration, or pecuniary interest from a SBDC client or Affiliated Entity while the client is active or during the Restricted Period unless an approved Part B of the Conflict of Interest Policy and Agreement for client(s) is in place.
- Personnel shall not recommend to clients the purchase of goods and/or services in which they have a personal interest; solicit or accept fees or commissions from third parties who have supplied goods and/or services on the recommendation of the SBDC personnel; accept fees, commissions, or gifts of any value from the client for services rendered through the Orange County / Inland Empire SBDC Network; or solicit or accept the private engagement of services or future employment at any time during the term of engagement with the SBDC client and the Restrictive Period.
- Personnel shall treat all client information with the strictest degree of confidentiality during and after employment with the SBDC and shall only use the information as it relates to his or her work with the SBDC. Additionally, SBDC personnel will not disclose any confidential client information to third parties other than the SBA, without the written consent of Client.

I HAVE READ THE FOREGOING CONFLICT OF INTEREST POLICY AND AGREEMENT, I AGREE TO ITS TERMS, AND MY ACTIONS HAVE BEEN AND WILL CONTINUE TO BE GUIDED THEREBY.

DATE

STAFF/VOLUNTEER

DATE

SBDC DIRECTOR

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

CONFLICT OF INTEREST POLICY AND AGREEMENT
Part B- CLIENT-SBDC RELEASE FORM

(To be completed by SBDC client)

I, _____, (*Client*) have recently requested consulting from or have been a client of the _____ SBDC (*SBDC*); In the course of working with the SBDC, I worked with, _____ (*Consultant*) who is a consultant for the SBDC. I have independently, and of my own free will, decided that I would like to retain the consultant to privately work with me on developing my business. I understand that the SBDC does not charge any fees for consulting services and that any contractual relationship that I enter into with the consultant is entirely between me and the consultant and is totally independent of my request for assistance from the SBDC. In order to avoid any possible conflict of interest on the consultant's part, or any appearance of impropriety, I hereby release the SBDC from any responsibility related to this arrangement and ask that a signed copy of this request be placed in my SBDC client file.

Please provide a brief description of the nature of the service(s) is to be rendered:

In consideration of the foregoing, I understand that the scope of services I may receive from the SBDC is limited to any area for which you provide assistance other than <list areas, be specific i.e. government contracting, on-line marketing/social media, etc.>. I understand that this does not limit my ability to utilize the SBDC for other types of business assistance that the SBDC offers.

Client Name (Print or Type)

Client Street Address City State Zip

Signature Date

Acknowledged:

SBDC Director Date Consultant Date

Regional Director Date

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

APPENDIX B: Client Information Form – SBA FORM 641

Client Information Form

1. Name of the Office Providing the Service: 1a. Type of Client: ☐ Face to Face ☐ Online ☐ Telephone
2. City/State of Office Location:

PART I: Client Request for Counseling

3. Client Name (Last, First, MI)		4. E-mail Address	
5. Telephone Home: Business:		6. Fax	
7. Street Address/P.O. Box	8. City	9. State	10. ZIP Code
<p>11. I request business management assistance from the Small Business Administration (SBA)/Small Business Development Center (SBDC). I agree to cooperate should I be selected to participate in surveys designed to evaluate SBA/SBDC assistance services. I authorize the SBA/SBDC to furnish relevant information to the assigned management counselor(s), although I expect that information to be held in strict confidence by him/her.</p> <p>I further understand that all counselors have agreed not to recommend goods or services from sources in which they have an interest. SBA/SBDC will not accept fees or commissions developing from this counseling relationship. By my signature below, and in consideration of the center's furnishing of management or technical assistance, I waive all claims against SBA, SCORE, California State University Fullerton, SBDC and its host organization.</p> <p>I understand that there are no warranties or assurances in connection with the counseling assistance.</p> <p>I permit SBA or its agent the use of my name and address for SBA surveys and information mailings regarding SBA products and services (<input type="checkbox"/> Yes <input type="checkbox"/> No)</p>			
12. Preferred date/time for appointment Date: Time:		13. Client Signature Date:	

PART II: Client Intake (to be completed by all Clients)

14. Race <input type="checkbox"/> Asian <input type="checkbox"/> Black or African American <input type="checkbox"/> Native American or Alaskan Native <input type="checkbox"/> Native Hawaiian or Pacific Islander <input type="checkbox"/> White		15. Ethnicity <input type="checkbox"/> Hispanic Origin <input type="checkbox"/> Not of Hispanic Origin	16. Gender <input type="checkbox"/> Male <input type="checkbox"/> Female	17. Person with Disability? <input type="checkbox"/> Yes <input type="checkbox"/> No																								
18. Veteran Status <input type="checkbox"/> Non-Veteran <input type="checkbox"/> Veteran <input type="checkbox"/> Service-Disabled Veteran		18a. Military Status <input type="checkbox"/> Member of Reserve or National Guard <input type="checkbox"/> On Active Duty																										
19. What inspired you to contact us? <input type="checkbox"/> SBA <input type="checkbox"/> Client/Word of Mouth <input type="checkbox"/> Chamber of Commerce <input type="checkbox"/> Bank <input type="checkbox"/> Magazine <input type="checkbox"/> Educational Institution <input type="checkbox"/> Business Owner <input type="checkbox"/> Internet <input type="checkbox"/> Local Economic Development Official <input type="checkbox"/> Television/Radio <input type="checkbox"/> Newspaper <input type="checkbox"/> Other: _____																												
20. Is the client currently in business? <input type="checkbox"/> Yes <input type="checkbox"/> No (If no, skip to 30)		21. Name of Company																										
22. Business Type <table border="0"><tr><td><input type="checkbox"/> Mining</td><td><input type="checkbox"/> Manufacturing</td><td><input type="checkbox"/> Real Estate</td><td><input type="checkbox"/> Professional Services</td></tr><tr><td><input type="checkbox"/> Utilities</td><td><input type="checkbox"/> Finance and Insurance</td><td><input type="checkbox"/> Health Care</td><td><input type="checkbox"/> Management</td></tr><tr><td><input type="checkbox"/> Information</td><td><input type="checkbox"/> Wholesale Trade</td><td><input type="checkbox"/> Accommodation/Food Services</td><td><input type="checkbox"/> Agriculture</td></tr><tr><td><input type="checkbox"/> Construction</td><td><input type="checkbox"/> Public Administration</td><td><input type="checkbox"/> Arts/Entertainment</td><td><input type="checkbox"/> Administrative Support</td></tr><tr><td><input type="checkbox"/> Retail Trade</td><td><input type="checkbox"/> Educational Services</td><td><input type="checkbox"/> Transportation/Warehousing</td><td><input type="checkbox"/> Waste Management</td></tr><tr><td></td><td></td><td></td><td><input type="checkbox"/> Other Services</td></tr></table>					<input type="checkbox"/> Mining	<input type="checkbox"/> Manufacturing	<input type="checkbox"/> Real Estate	<input type="checkbox"/> Professional Services	<input type="checkbox"/> Utilities	<input type="checkbox"/> Finance and Insurance	<input type="checkbox"/> Health Care	<input type="checkbox"/> Management	<input type="checkbox"/> Information	<input type="checkbox"/> Wholesale Trade	<input type="checkbox"/> Accommodation/Food Services	<input type="checkbox"/> Agriculture	<input type="checkbox"/> Construction	<input type="checkbox"/> Public Administration	<input type="checkbox"/> Arts/Entertainment	<input type="checkbox"/> Administrative Support	<input type="checkbox"/> Retail Trade	<input type="checkbox"/> Educational Services	<input type="checkbox"/> Transportation/Warehousing	<input type="checkbox"/> Waste Management				<input type="checkbox"/> Other Services
<input type="checkbox"/> Mining	<input type="checkbox"/> Manufacturing	<input type="checkbox"/> Real Estate	<input type="checkbox"/> Professional Services																									
<input type="checkbox"/> Utilities	<input type="checkbox"/> Finance and Insurance	<input type="checkbox"/> Health Care	<input type="checkbox"/> Management																									
<input type="checkbox"/> Information	<input type="checkbox"/> Wholesale Trade	<input type="checkbox"/> Accommodation/Food Services	<input type="checkbox"/> Agriculture																									
<input type="checkbox"/> Construction	<input type="checkbox"/> Public Administration	<input type="checkbox"/> Arts/Entertainment	<input type="checkbox"/> Administrative Support																									
<input type="checkbox"/> Retail Trade	<input type="checkbox"/> Educational Services	<input type="checkbox"/> Transportation/Warehousing	<input type="checkbox"/> Waste Management																									
			<input type="checkbox"/> Other Services																									
23. Business Ownership Gender <input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Male/Female (50/50)		24. Date Established	25. Business Online? <input type="checkbox"/> Yes <input type="checkbox"/> No	26. Home-Based Business? <input type="checkbox"/> Yes <input type="checkbox"/> No																								
27a. Full-Time Employees	28. For the most recent full year, what were your: Gross Revenues/Sales \$ _____ +Profits/-Losses \$ _____		29. Organization Type <input type="checkbox"/> Sole Proprietorship <input type="checkbox"/> Corporation <input type="checkbox"/> LLC <input type="checkbox"/> Sub S Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> Other: _____																									
27b. Part-Time Employees																												
30. Area(s) of Counseling Requested <table border="0"><tr><td><input type="checkbox"/> Start-up Assistance</td><td><input type="checkbox"/> Human Resources/Managing Employees</td><td><input type="checkbox"/> Marketing/Sales</td><td><input type="checkbox"/> Technology/Computers</td></tr><tr><td><input type="checkbox"/> Business Plan</td><td><input type="checkbox"/> Customer Relations</td><td><input type="checkbox"/> Government Contracting</td><td><input type="checkbox"/> eCommerce</td></tr><tr><td><input type="checkbox"/> Financing/Capital</td><td><input type="checkbox"/> Business Accounting/Budget</td><td><input type="checkbox"/> Franchising</td><td><input type="checkbox"/> Legal Issues</td></tr><tr><td><input type="checkbox"/> Managing a Business</td><td><input type="checkbox"/> Cash Flow Management</td><td><input type="checkbox"/> Buy/Sell Business</td><td><input type="checkbox"/> International Trade</td></tr><tr><td></td><td><input type="checkbox"/> Tax Planning</td><td></td><td><input type="checkbox"/> Other: _____</td></tr></table>					<input type="checkbox"/> Start-up Assistance	<input type="checkbox"/> Human Resources/Managing Employees	<input type="checkbox"/> Marketing/Sales	<input type="checkbox"/> Technology/Computers	<input type="checkbox"/> Business Plan	<input type="checkbox"/> Customer Relations	<input type="checkbox"/> Government Contracting	<input type="checkbox"/> eCommerce	<input type="checkbox"/> Financing/Capital	<input type="checkbox"/> Business Accounting/Budget	<input type="checkbox"/> Franchising	<input type="checkbox"/> Legal Issues	<input type="checkbox"/> Managing a Business	<input type="checkbox"/> Cash Flow Management	<input type="checkbox"/> Buy/Sell Business	<input type="checkbox"/> International Trade		<input type="checkbox"/> Tax Planning		<input type="checkbox"/> Other: _____				
<input type="checkbox"/> Start-up Assistance	<input type="checkbox"/> Human Resources/Managing Employees	<input type="checkbox"/> Marketing/Sales	<input type="checkbox"/> Technology/Computers																									
<input type="checkbox"/> Business Plan	<input type="checkbox"/> Customer Relations	<input type="checkbox"/> Government Contracting	<input type="checkbox"/> eCommerce																									
<input type="checkbox"/> Financing/Capital	<input type="checkbox"/> Business Accounting/Budget	<input type="checkbox"/> Franchising	<input type="checkbox"/> Legal Issues																									
<input type="checkbox"/> Managing a Business	<input type="checkbox"/> Cash Flow Management	<input type="checkbox"/> Buy/Sell Business	<input type="checkbox"/> International Trade																									
	<input type="checkbox"/> Tax Planning		<input type="checkbox"/> Other: _____																									
31. Describe specific assistance requested:																												

SBA Form 641 (5/04), Softshare revision 9/05

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

Completing FORM 641

ITEM BLOCK 1

Name of the Office Providing the Service: Type the name of the SBDC Office that is providing you with service.

ITEM BLOCK 1a

Type of Client: Place a check mark next to the appropriate box.

ITEM BLOCK 2

City/State of Office Location: Type the city and state of the office location.

ITEM BLOCK 3

Client Name: Provide the client last name, first name and middle initial.

ITEM BLOCK 4

E-mail Address: Type the e-mail address in the space provided.

ITEM BLOCK 5

Telephone: Type the home and business telephone numbers in the spaces provided.

ITEM BLOCK 6

Fax: Type a fax number in the spaces provided.

ITEM BLOCK 7

Street Address/PO Box

ITEM BLOCK 8

City

ITEM BLOCK 9

State

ITEM BLOCK 10

ZIP Code

ITEM BLOCK 11

Read the authorization agreement. Place a checkmark in the box Yes or No box to indicate whether or not you permit the SBA to use your name and address for SBA surveys.

ITEM BLOCK 12

Preferred date/time for appointment:

ITEM BLOCK 13

Client Signature/Signature Date:

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

PART II: CLIENT INTAKE

ITEM BLOCK 14

Race:

Place a checkmark next to the appropriate box.

ITEM BLOCK 15:

Ethnicity:

ITEM BLOCK 16

Gender: M/F

ITEM BLOCK 17

Person with Disability: Y/N

ITEM BLOCK 18

Veteran Status: Place a checkmark next to the appropriate box.

ITEM BLOCK 18a

Military Status: Place a checkmark next to the appropriate box.

ITEM BLOCK 19

What inspired you to contact us? Place a checkmark next to the appropriate box.

ITEM BLOCK 20

Is the client currently in business? Y/N

ITEM BLOCK 21

Name of Company: Type the name of the company in the space provided.

ITEM BLOCK 22

Business Type: Place a checkmark next to the box that most closely represents your business type.

ITEM BLOCK 23

Business Ownership Gender: Place a checkmark in the box that reflects the ownership gender.

ITEM BLOCK 24

Date Established: Type the name of date the business was established in MM/DD/YYYY format.

ITEM BLOCK 25

Business Online? Y/N

ITEM BLOCK 26

Home based business? Y/N

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

ITEM BLOCK 27a

Full-Time Employees: Type the number of full time employees.

ITEM BLOCK 27b

Part-Time Employees: Type the number of part time employees.

ITEM BLOCK 28

Most recent year gross revenues/sales: This information must be completed as accurately as possible.

ITEM BLOCK 29

Organization Type: Place a checkmark in the box next to the type of organization.

ITEM BLOCK 30

Areas of Counseling Requested: Place a checkmark in the box(es) to indicate the type of counseling you are requesting.

ITEM BLOCK 31

Describe specific assistance requested in the space provided.

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

APPENDIX C: Counseling Information Form – SBA FORM 641 Part III

SBA FORM 641 Part III, "Counseling Information Form," is used for recording client consulting actions and other data. This form is generated in WebCATS from the Request for Consulting and the consultant's case report.

COUNSELING RECORD (1062)				
A. Location Code 437230	B. SBDC Code RVRSD	C. Client No. VV2826	D. Date of Contact 10/20/2012	E. Type of Action Follow-up [3]
F. Name of Company Beauty Mechanics Hair Salon			G. Name of Inquirer (Last, First, MI) Sander, Kathryn A.	
H. Address of Company/Inquirer 12053 Mariposa Rd. Ste. J			I. City/Town HESPERIA	J. State CA
K. Zip Code 92345-1616		L. Telephone Number (760) 244-4700		
BUSINESS INFORMATION			STATUS INFORMATION	
M. Type of Business Service Establishment [2]			P. Ownership Gender Woman-Owned [2]	
N. SIC/NAICS CODES SICS: 7231 NAICS: 611511			Q. Inquirer Background a. Race: White/Caucasian [5] b. Hispanic? Not of Hispanic Origin [2]	
O. SBA Client None []			R. Ownership Military Status Non-veteran [4]	
S. Area of Counseling Provided Financing/Capital [2]				
T. Contact Hours 0.25	U. Preparation Hours 0.5		V. Travel Hours 0	W. COUNSELOR NUMBER LLM
X. COUNSELOR(S) Louisa L. Miller			Y. RESOURCE Consultant [7]	
2. Problems/Comments/Recommendations Follow up A. Client History (Complete this section after the initial session only) Client seeking business plan/funding assistance to expand hair salon 1. Provide a description about what occurred during this session. Client reported that she is still waiting for her accountant to provide her with her previous year's financials/taxes as well as her cash flow projections. Client stated that the delay has been caused by health issues. 2. What are the issues and steps that need to be taken? (Describe the needs of the client and any questions or concerns he/she have) 3. Client Action Items: (Explain any action items given to the client and due dates.) 4. Consultant Action Items: (Explain any action items to be completed by the consultant and due dates.) Follow up within 30 days.				

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

APPENDIX D: Sample Counseling forms with Critique

COUNSELING RECORD (1062)				
A. Location Code Lcenter	B. SBDC Code LC	C. Client No. 00006	D. Date of Contact 2/23/2005	E. Type of Action Initial [2]
F. Name of Company Caudill, Wesley M.			G. Name of Inquirer (Last, First, MI) Caudill, Wesley M.	
H. Address of Company/Inquirer 800 N. State College, LH640			I. City/Town Fullerton	J. State CA
K. Zip Code 92831		L. Telephone Number (612) 123-1212		
BUSINESS INFORMATION			STATUS INFORMATION	
M. Type of Business Service Establishment [2]			P. Ownership Gender Male [1]	
N. SIC/NAICS CODES SICS: 5812 NAICS: 722110			Q. Inquirer Background a. Race: White/Caucasian [5] b. Hispanic? Not of Hispanic Origin [2]	
O. SBA Client None []			R. Ownership Military Status Non-veteran [4]	
S. Area of Counseling Provided Source of Capital [2]				
T. Contact Hours 1	U. Preparation Hours 1	V. Travel Hours 0	W. COUNSELOR NUMBER MJS	
X. COUNSELOR(S) Michael James Smith			Y. RESOURCE Employee [4]	
Z. Problems/Comments/Recommendations Client was advised on the necessary information to proceed.				

SBA Form 1062

- Improvements:**
- #1 A description of the business other than the codes.
 - #2 What are the Issues and Actions to be taken? What occurred to substantiate 2 hours of time?
 - #3 What are the Client follow-up Actions?
 - #4 What are the Consultant follow-up Actions?

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

COUNSELING RECORD (1062)				
A. Location Code Lcenter	B. SBDC Code LC	C. Client No. 00007	D. Date of Contact 2/23/2005	E. Type of Action Initial [2]
F. Name of Company The Emery Market Deli			G. Name of Inquirer (Last, First, MI) Clepper, Andy	
H. Address of Company/Inquirer 800 N. State College, LH640			I. City/Town Fullerton	J. State CA
K. Zip Code 92831		L. Telephone Number (612) 123-1212		
BUSINESS INFORMATION			STATUS INFORMATION	
M. Type of Business Retail Dealer [2]			P. Ownership Gender Male [1]	
N. SIC/NAICS CODES SICS: 5499 NAICS:			Q. Inquirer Background a. Race: White/Caucasian [5] b. Hispanic? Not of Hispanic Origin [2]	
O. SBA Client None []			R. Ownership Military Status Non-veteran [4]	
S. Area of Counseling Provided Source of Capital [2]				
T. Contact Hours 1	U. Preparation Hours 3		V. Travel Hours 0	W. COUNSELOR NUMBER MJS
X. COUNSELOR(S) Michael James Smith			Y. RESOURCE Employee [4]	
Z. Problems/Comments/Recommendations Situation: Client has been approached to start a deli/market on the first floor of one of the newly renovated loft apt. buildings in downtown Portland. He has no experience in food business. Gave preliminary plan to consult for review. Consultant Actions: Reviewed business plan and made notes: problems with market data and with non-standard pro formas. Met with client and discussed various models for store, esp. Silverglades on Clough Pike and the Dilly Deli in Marimont. Worked with client to revise pro formas and present them more logically. Client Actions: To gather better market data and to meet with Al Silverglade to review numbers and business plan. Follow-up: Consultant/Client in 60 days.				

SBA Form 1062

- Good:
- #1 Description about what occurred
 - #2 Issue identified and steps: needs market data and reworked pro formas
 - #3 Client follow-up actions identified
 - #4 Consultant follow-up actions identified
- Dates of expected follow-up
- File Documents:
Pro formas; Business Plan

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

COUNSELING RECORD (1062)				
A. Location Code Lcenter	B. SBDC Code LC	C. Client No. 00008	D. Date of Contact 2/23/2005	E. Type of Action Follow-up [3]
F. Name of Company Hawkins Research			G. Name of Inquirer (Last, First, MI) Hawkins, Gale	
H. Address of Company/Inquirer 800 N. State College, LH640			I. City/Town Fullerton	J. State CA
K. Zip Code 92831		L. Telephone Number (612) 123-1212		
BUSINESS INFORMATION			STATUS INFORMATION	
M. Type of Business Retail Dealer [2]			P. Ownership Gender Male [1]	
N. SIC/NAICS CODES SICS: 5499 NAICS:			Q. Inquirer Background a. Race: White/Caucasian [5] b. Hispanic? Not of Hispanic Origin [2]	
O. SBA Client None []			R. Ownership Military Status Non-veteran [4]	
S. Area of Counseling Provided Source of Capital [2]				
T. Contact Hours 1	U. Preparation Hours 3		V. Travel Hours 0	W. COUNSELOR NUMBER MJS
X. COUNSELOR(S) Michael James Smith			Y. RESOURCE Employee [4]	
Z. Problems/Comments/Recommendations Worked on financial data for the pre-qual application.				

SBA Form 1062

- Improvements:
- #1 Description about what occurred.
 - Identify what documents were prepared
 - #2 Good: Issue identified and steps to be taken:
 - Financials needed for business loan application
 - #3 Client follow-up Actions:
 - Add: to wait on the consultant for financials, expected date.
 - #4 Consultant follow-up Actions:
 - To prepare financials for the client
- File Documents:
- Financials

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

COUNSELING RECORD (1062)				
A. Location Code Lcenter	B. SBDC Code LC	C. Client No. 00009	D. Date of Contact 2/23/2005	E. Type of Action Initial [2]
F. Name of Company Henry City Care Team			G. Name of Inquirer (Last, First, MI) Druin, Nellie	
H. Address of Company/Inquirer 800 N. State College, LH640			I. City/Town Fullerton	J. State CA
K. Zip Code 92831		L. Telephone Number (612) 123-1212		
BUSINESS INFORMATION			STATUS INFORMATION	
M. Type of Business Service Establishment [2]			P. Ownership Gender Male [1]	
N. SIC/NAICS CODES SICS: 8322 NAICS:			Q. Inquirer Background a. Race: White/Caucasian [5] b. Hispanic? Not of Hispanic Origin [2]	
O. SBA Client None []			R. Ownership Military Status Non-veteran [4]	
S. Area of Counseling Provided Government Procurement [2]				
T. Contact Hours 1	U. Preparation Hours 3	V. Travel Hours 0	W. COUNSELOR NUMBER MJS	
X. COUNSELOR(S) Michael James Smith			Y. RESOURCE Employee [4]	
Z. Problems/Comments/Recommendations <ul style="list-style-type: none"> -Call Nellie and giver her information for the center for not for profit excellence. -Angela had questions about her and her husband's surveying company. -They are having problems with thier CPA. I gave her our accounting contact sheet. She knows Jim Jennings and will call him about her concerns. -She is interested in woman-owned business certification for government bids. Suggested that she contact Department of Transportation. 				

SBA Form 1062

Improvements:

- #1 How can consulting continue based on this narrative? What statements could be added to indicate next steps? Who is the client – Nellie or Angela?
- #2 What are the Issues/Actions to be taken?
- #3 What are the Client follow-up Actions?
- #4 What are the Consultant follow-up Actions?

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

COUNSELING RECORD (1062)				
A. Location Code Lcenter	B. SBDC Code LC	C. Client No. 00010	D. Date of Contact 2/23/2005	E. Type of Action Follow-up [3]
F. Name of Company Nelson, Jonathan			G. Name of Inquirer (Last, First, MI) Nelson, Jonathan	
H. Address of Company/Inquirer 800 N. State College, LH640			I. City/Town Fullerton	J. State CA
K. Zip Code 92831		L. Telephone Number (612) 123-1212		
BUSINESS INFORMATION			STATUS INFORMATION	
M. Type of Business Not in Business [6]			P. Ownership Gender Male [1]	
N. SIC/NAICS CODES SICS: 7349 NAICS:			Q. Inquirer Background a. Race: White/Caucasian [5] b. Hispanic? Not of Hispanic Origin [2]	
O. SBA Client None []			R. Ownership Military Status Service-Disabled Veteran [2]	
S. Area of Counseling Provided Business Start-up/Acquisition [2]				
T. Contact Hours 1	U. Preparation Hours .25		V. Travel Hours 0	W. COUNSELOR NUMBER MJS
X. COUNSELOR(S) Michael James Smith			Y. RESOURCE Employee [4]	
Z. Problems/Comments/Recommendations I met with Jonathan at the library to review his cash flow worksheets and to answer questions regarding his projected financials. We included some additional expenses to better reflect the business proposal. I will work on inputting data to spreadsheets for clients use in visiting with loan officers. At this time, he plans to approach Bank One and PNC Bank. I will provide financials to client once completed. Client will work on narrative and forward to me by email for review.				

SBA Form 1062

Good:

- #1 Description about what occurred
- #2 Issue identified and steps to improve financials
- #3 Client follow-up identified
- #4 Consultant follow-up actions identified

Improvements

Dates to expect narrative and financials

File Documents:

- Business Plan
- Financials

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

APPENDIX E: Training Form 888

MANAGEMENT TRAINING REPORT

1. Office Providing Service:

City/State:

2. Organization/PIMS		3. Dates of Training Started: Ended:		4. Number of Sessions		5. Training Hours (Outreach Hours)	
6. Title of Training				7. Location of Training City: State: Zip:			
8. Total Number Trained _____ _____ Currently in Business _____ Not Yet in Business _____ People with Disabilities _____ Women _____ Total Veterans _____ Service-Disabled Vets _____ Members of Reserve/Nat'l Guard				9. Total Number of Minorities Trained _____ Race _____ Asians _____ Blacks or African-Americans _____ Native Americans or Alaskan Natives _____ Native Hawaiians or other Pacific Islanders _____ White Ethnicity _____ Hispanic Origin _____ Not of Hispanic Origin			
10. Training Topic							
11. Resource Partners Participating <input type="checkbox"/> SCORE <input type="checkbox"/> Chamber of Commerce <input type="checkbox"/> SBA District Office <input type="checkbox"/> SBDC <input type="checkbox"/> Trade or Professional Society <input type="checkbox"/> Native American Center <input type="checkbox"/> Women's Business Center <input type="checkbox"/> For-Profit Organization <input type="checkbox"/> Other Government Agency <input type="checkbox"/> VBOC <input type="checkbox"/> Online Training Resource <input type="checkbox"/> Other <input type="checkbox"/> Educational Institution							
12. Program Format							
13. Attendee Fees Full Fee 0 x \$ 0.00 = \$ 0.00 Discounted Fee #1 0 x \$ 0.00 = \$ 0.00 Discounted Fee #2 0 x \$ 0.00 = \$ 0.00 Discounted Fee #3 0 x \$ 0.00 = \$ 0.00 No Fee 3 x \$ 0.00 = \$ 0.00 No Show Income 0 x \$ 0.00 = \$ 0.00 Other Income = \$ 0.00				15. Fee Distribution SCORE: \$ 0.00 SBDC: \$ 0.00 SBA: \$ 0.00 Cosponsor(s): \$ 0.00			
14. Total Gross Income \$				16. Language Used English			
17. Name of Sponsor							
18. Name of Cosponsor(s)							

SBA Form 888 (5/04), Softshare revision 10/05

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

Completing FORM 888

ITEM BLOCK 1:

Office Providing Service: xxxxx

ITEM BLOCK 2:

Organization/PIMS: xxxxx

ITEM BLOCK 3:

Place beginning and ending date of training.

ITEM BLOCK 4:

Number of Sessions: xxxx

ITEM BLOCK 5:

Place the total hours of training. For example, training was held from 7:00-9:00 p.m. and there were 20 attendees. The Total Hours of Training come to 40. This is calculated as follows: 20 (number of attendees) X 2 (number of hours of training program).

ITEM BLOCK 6:

Total Number Trained: xxxx

ITEM BLOCKS 7:

Location of Training:

ITEM BLOCK 8:

Total Number Trained:

This section is very important. Enter the total number of attendees. Demographic data is collected in this section. Item (8a)-"Total" should be the total that attended the event, not the number who turned in an evaluation. Items 8a-8h, "business ownership, minorities, women, total veterans, Vietnam-era veterans, disabled veterans and SBA clients," may add up to more or less than the total number of attendees.

ITEM BLOCK 9:

Total Number of Minorities Trained

ITEM BLOCK 10:

Training Topic: Provide brief description of the training topic.

ITEM BLOCK 11:

Resource Partners Participating: Place a checkmark next to any resource partners that participated in the training event. If the appropriate check box is not listed check the other box.

ITEM BLOCK 12:

Program Format: Select a program format from the drop down box.

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

Pre-business workshop: This workshop provides a comprehensive introduction to the fundamentals of starting a business. Pre-business workshops are not supported by EDMIS and will automatically be exported to the EDMIS System as a conference.

Conference: To be considered a conference, the training must be less than a total of eight hours. BE AWARE, however, that training of less than two hours is not acceptable for reporting purposes.

Course: This consists of a series of sessions. This training may last one day or more, but must exceed eight hours in total.

TV/Media: This type of training denotes a session or series conducted on television/media.

If the training has not been presented in the past year, list it as new. If it has been presented in the past year, list it as on going.

ITEM BLOCK 13:

Attendee Fees: Provide the number of attendees and the corresponding fee amount. Place the amount of the discounted fee charged for the training. If there are varied levels of discounted fees, list the discounted amounts in the spaces provided and retain in the Training Event file. On FORM 888, place the average discount fee only. This is calculated as follows: Total the revenue received from the discounted fees, divide this amount by the number of attendees that paid discounted fees, and place this average discounted fee amount on the FORM 888. In the space provided place the total number of attendees that paid discounted fees. Enter the number of attendees that paid no fees for the training in the spaces provided.

ITEM BLOCK 14:

Total Gross Income: xxx

ITEM BLOCK 15:

Indicate the total amount of gross fee income collected from the training. This amount is the amount of income before any expenses are deducted. Show the distribution of fee income accordingly. Also list cosponsor contact(s)/telephone that received fee income. This amount must equal the amount shown under ITEM BLOCK 14. Again, this amount accounts for the total income from the training prior to any expense deductions. For example, the center paid \$200 for the speaker from the total amount \$500 allocated to the center. The amount reported should be \$500. This was the amount distributed to the center prior to any expense deductions.

ITEM BLOCK 16:

Language Used:

ITEM BLOCKS 17

Name of Sponsor:

ITEM BLOCKS 18:

Name of Cosponsors

Leave blank

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

APPENDIX F: Co-Sponsorship Agreement

Co-Sponsorship Agreement
_____ SBDC

The undersigned parties agree as follows:

1. This agreement is between the _____ Small Business Development Center and _____.
2. The purpose of this agreement is to describe the rights and responsibilities of each party regarding the co-sponsorship described below. Except as properly amended, this agreement is the final and complete agreement of the parties.
3. Co-sponsorship activity:
Events: _____
Place: _____
Estimated number of clients: _____
Types of assistance to be provided: _____
4. Tuition from the above mentioned programs will go to _____. All fees from the above mentioned programs will go directly to _____.
5. Neither the _____ SBDC nor the _____ co-sponsorship constitutes or implies any endorsement of any of the opinions, products, or services of either (or any other) co-sponsor.
6. Any political candidates participating in educational services under this co-sponsorship will refrain from political comment as part of their participation.
7. Co-sponsors who have a pre-existing business relationship with _____, the _____ SBDC, or SBA understand that co-sponsoring these activities creates no special consideration by the cosponsors regarding any other matter.
8. This agreement may be amended. Mutually agreeable amendments will be recorded in writing within three (3) months of the conversation creating the amendment, signed by both parties, and reviewed by the Small Business Development Center Network Office and the SBA district office.
9. Any party may terminate its participation in the co-sponsorship upon six (6) months written notice to the other parties. Such termination will not require changes to materials already produced and will not entitle the terminating party to a return of funds or property distributed. Both _____ and the _____ SBDC reserve the right to give appropriate notice to the public of termination in case a violation of the agreement occurs.

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

10. Each of the persons executing this agreement represents that she or he has the authority to enter into this agreement on behalf of the entity involved.

Executed by:

Co-sponsoring Organization

Name

Date

Title

SBDC Director

Date

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

APPENDIX G: Sample Training Workshop Evaluation

Please rate each question on a scale of 1 to 5 (5 being excellent and 1 unacceptable). *Circle* your choice.

- | | | | | | | |
|----|---|---|---|---|---|---|
| 1. | How would you rate the workshop: | | | | | |
| | Overall value | 5 | 4 | 3 | 2 | 1 |
| | The format | 5 | 4 | 3 | 2 | 1 |
| | Relevancy of material to my business/job | 5 | 4 | 3 | 2 | 1 |
| | The quality of overheads if used | 5 | 4 | 3 | 2 | 1 |
| | The quality of hand-outs if used | 5 | 4 | 3 | 2 | 1 |
| | The quality of videos if used | 5 | 4 | 3 | 2 | 1 |
| 2. | How would you rate the instructor: | | | | | |
| | Organization | 5 | 4 | 3 | 2 | 1 |
| | Knowledge of the subject | 5 | 4 | 3 | 2 | 1 |
| | Preparation | 5 | 4 | 3 | 2 | 1 |
| | Encouragement of group interaction | 5 | 4 | 3 | 2 | 1 |
| | Attitude toward participants | 5 | 4 | 3 | 2 | 1 |
| | Presentation skills | 5 | 4 | 3 | 2 | 1 |
| 3. | How would you rate the location: | | | | | |
| | Room (size, arrangement, temperature) | 5 | 4 | 3 | 2 | 1 |
| | Overall facility (parking, restrooms, access) | 5 | 4 | 3 | 2 | 1 |

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

APPENDIX H: Training Summary Report

(Available as an Excel Spreadsheet. Contact Lead Center for File.)

Training Summary Report

Category: _____

Title: _____

Date: _____

Instructor: _____

Total number of Attendees: _____

Referral Summary

_____ SBDC
 _____ Direct Mail
 _____ Publication
 _____ Lenders/Banks
 _____ SBA Office
 _____ Heard about it at a lunch or dinner
 _____ website
 _____ Other

Industry Summary

_____ 0 Retail
 _____ 0 Construction
 _____ 0 Wholesale
 _____ 0 Service
 _____ 0 Manufacturing
 _____ 0 Internet

Customer Suggestions

How long new seminars should be? 2 Hrs. _____ 4 Hrs. _____ 8 Hrs. _____ Over 8 Hrs. _____
 Best days to attend new seminars? Mon _____ Tues _____ Wed _____ Thurs _____ Fri _____ Sat _____ 4
 How much would you pay for new seminars? \$30 _____ \$45 _____ \$65 _____ \$80 _____
 What did you think of the registration process and facilities?
 Very Good _____ Good _____ Fair _____ Poor _____

Trainer Summary

	Very Good		Good		Fair		Poor		Mean
	# of Responses	%	# of Responses	%	# of Responses	%	# of Responses	%	
Written materials used:	0	4%	####		####		####		####
Communication skills:	####		####		####		####		####
Ability to hold participants interest:	####		####		####		####		####
Organization of the program:	####		####		####		####		####
Number in Survey	_____								
AVERAGE MEAN #DIV/0!									

Total Satisfaction of Attendees out of 4.0 = #####

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

APPENDIX I: Success Story Writing Guide

The value and impact of a well-written success story is powerful. For this reason, we have developed this guide to help you write engaging and persuasive success stories.

Format

Frequently, the story that is submitted, whether it is with semi-annual reports or sent via e-mail, will look exactly the same way when it is distributed to stakeholders. Therefore, success stories submitted to the State Director's Office must be able to be photocopied for distribution, and:

- Must be on your SBDC's letterhead or masthead;
 - Should include client pictures, images, logos, or other graphic elements; and
 - Should feature client quotes about their positive experiences with the SBDC.

In general, success stories should be formatted to address the following:

1. Background information about the client
2. The problem(s) the client faced
3. The assistance and help the SBDC provided
4. Outcome and impact of the assistance

Required Information

The following is basic information about clients that should be included with all success stories:

- Business name
- First and last name of client **(only if publicity release is on file)**
- Job title
- Business address
- Website address
 - County
 - Date business established

Additional key points to focus on:

1. Jobs created
2. Increase in/new sales
3. New markets penetrated
4. Use of multiple SBDC services (i.e. EMAP, international trade, educational programs, etc.)
5. Financing obtained

Questions to Answer to Make for an Interesting Story

The questions below offer the kind of information that would make for a good success story.

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

Please do not write your success story in direct response to these questions.

Characters

- Who are the small business owners?
- Where do they live? (suburban area, big city, rural location, etc.)
- What did they do before they became entrepreneurs?
- Why did they decide to become entrepreneurs?
- Why did they select the particular type of business?
- Is there a client quote or comment about the SBDC?

Conflict

- What challenges/obstacles have been overcome to start/grow the business?
- Was the entrepreneur turned down for loans?
- Did a first business fail?
- Does the entrepreneur face physical, financial or other obstacles?

Content

- How did the person hear about the SBDC? Who referred them?
- How did the person decide to open a business?
- How long did it take?
- What is the basic chronology of events?
- What is the SBDC's involvement? What type of assistance was provided?
- What other resource agencies helped (DCED, SBA, etc.)?

Conclusion

- How did SBDC consulting make a difference?
 - How much growth (employees, sales, new locations, etc.) has the business experienced?
 - What are the contributions the business and entrepreneur make to the community?

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

APPENDIX J: In-Kind Affidavit & In-Kind Valuation Schedule

CALIFORNIA
SBDCSmall Business
Development Centers
Santa Ana Regional Network

In- Kind Contributions

1. SBDC Information				
a. Full Name, Mailing Address & Phone				
2. Contributor Information				
a. Full Name, Mailing Address & Phone			b. Type of Contributor	
			<input type="checkbox"/> Individual	
			<input type="checkbox"/> Company	
			<input type="checkbox"/> Other	
c. Company Name				
3. Service Contributed				
a. Description	b. Date (mm/dd/yyyy)	c. Hours	d. Fair Market Rate	e. Fair Market Amount
f. Total Amount of Service Contributed				
4. Equipment, Supplies, Goods, and Non/Service Contributions				
a. Description	b. Date (mm/dd/yyyy)	c. Fair Market Amount		
d. Total Amount of Equipment, Supplies, Goods, and Non/Service Contributions				
5. Total Contribution (combined Amount of 3f and 4d)				
Contributor's Signature			Date	
SBDC Use Only Period Claimed: _____ (Quarter/mm/yyyy)			Please sign and date the complete form and return it to the SBDC by mail or fax.	
Affidavit Number: _____				

April 2008

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

In Kind Affidavit Instructions

1. SBDC Information

- a. Click the black arrow in the box 1a. Select the relevant SBDC location from the list provided and press enter.

2. Contributor Information

- a. Type the **Full Name, Mailing Address, and Phone Number** of the contributor.
- b. Check the appropriate box next to the **Type of Contributor**
- c. Type the **company name** if applicable.

3. Services Contributed

- a. Provide an itemized **Description** of the In-Kind Services that were performed.
- b. Provide the **Date** the In-Kind Services were performed.
- a. List the number of **Hours** contributed- not to exceed reasonable working hour in a day.
- b. Provide the **Fair Market Rate** Per Hour – Reference In-Kind Valuation Schedule for more information and rates of commonly donated service rates
- c. Provide **Total Market Amount**. This field should equal the Number of Hours * the Fair Market Rate per Hour.
- d. **Total Amount of Services Contributed**

4. Equipment, Supplies, Goods and Non-Service Contributions

- a. Itemized **Descriptions** of any **Non-Service Contributions**
- b. **Date** the **Non-Service** Contributions were supplied.
- c. **Fair Market Amount** of the Non/Service Contributions.
- d. **Total Non-Service Contributions**. Sum of each itemized non service contribution.

5. Total Contribution

- a. Total Amount of Services and Non-Services

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

In-Kind Valuation Schedule

Category	Position Description	Annual Salary + Benefits	Hourly Rate	Source
Attorney I	Prepares and examines contracts involving leases, licenses, purchases, sales, insurance, etc. Provides legal advice to an organization, prepares resolutions and forms, and participates in major legal actions. Responsible for foreseeing and protecting company against legal risks. Must be a graduate of an accredited law school with 0-3 years of experience. Familiar with standard concepts, practices, and procedures within a particular field. Relies on limited experience and judgment to plan and accomplish goals. Performs a variety of tasks. Works under general supervision. A certain degree of creativity and latitude is required.	\$126,745	\$ 60.94	Salary.com
Attorney II	Prepares and examines contracts involving leases, licenses, purchases, sales, insurance, etc. Provides legal advice to an organization, prepares resolutions and forms, and participates in major legal actions. Responsible for foreseeing and protecting the company against legal risks. Must be a graduate of an accredited law school with 2-5 years of experience and admitted into the state bar. Familiar with a variety of the field's concepts, practices, and procedures. Relies on experience and judgment to plan and accomplish goals. Performs a variety of tasks. A wide degree of creativity and latitude is expected.	\$166,562	\$80.08	Salary.com
Attorney III	Prepares and examines contracts involving leases, licenses, purchases, sales, insurance, etc. Provides legal advice to an organization, prepares resolutions and forms, and participates in major legal actions. Responsible for foreseeing and protecting the company against legal risks. Must be a graduate of an accredited law school with 5-8 years of experience and admitted into the state bar. Familiar with a variety of the field's concepts, practices, and procedures. Relies on extensive experience and judgment to plan and accomplish goals. Performs a variety of tasks. May lead and direct the work of others. A wide degree of creativity and latitude is expected.	\$214,615	\$103.18	Salary.com
Attorney IV	Prepares and examines contracts involving leases, licenses, purchases, sales, insurance, etc. Provides legal advice to an organization, prepares resolutions and forms, and participates in major legal actions. Responsible for foreseeing and protecting the company against legal risks. Requires a bachelor's degree in area of specialty and 8-10 years of experience in the field or in a related area. Familiar with a variety of the field's concepts, practices, and procedures. Relies on extensive experience and judgment to plan and accomplish goals. Performs a variety of tasks. Leads and directs the work of others. A wide degree of creativity and latitude is expected. Typically reports to a manager or head of a unit/department.	\$229,755	\$110.46	Salary.com

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

Attorney V	Prepares and examines contracts involving leases, licenses, purchases, sales, insurance, etc. Provides legal advice to an organization, prepares resolutions and forms, and participates in major legal actions. Responsible for foreseeing and protecting the company against legal risks. Requires a bachelor's degree in area of specialty and at least 10 years of experience in the field or in a related area. Familiar with a variety of the field's concepts, practices, and procedures. Relies on extensive experience and judgment to plan and accomplish goals. Performs a variety of tasks. Leads and directs the work of others. A wide degree of creativity and latitude is expected. Typically reports to a manager or head of a unit/department.	\$295,125	\$141.89	Salary.com
Public Relations Director	Directs and implements a company's public relations strategies. Manages media relations, announcements, editorial placement, and speaking opportunities. Develops press releases, white papers and supporting materials. Requires a bachelor's degree in a related area and at least 10 years of experience in the field. Familiar with a variety of the field's concepts, practices, and procedures. Relies on extensive experience and judgment to plan and accomplish goals. Performs a variety of tasks. Leads and directs the work of others. A wide degree of creativity and latitude is expected. Typically reports to top management.	\$179,916	\$86.50	Salary.com
Website Manager	Responsible for development, implementation and maintenance of the organization's website. Monitors web traffic, oversees the development of web content, and maintains web server. Ensures that the site meets the business needs of the organization. Requires a bachelor's degree in area of specialty and at least 7 years of experience in the field or in a related area. Familiar with a variety of the field's concepts, practices, and procedures. Relies on extensive experience and judgment to plan and accomplish goals. Performs a variety of tasks. Leads and directs the work of others. A wide degree of creativity and latitude is expected. Typically reports to a head of a unit/department.	\$132,829	\$63.86	Salary.com
Information Services Consultant	Works with end user groups to identify technical solutions to business problems or inefficiencies. Evaluates existing systems and/or user needs and makes recommendations. May require certification in specific applications. Requires a bachelor's degree and at least 7 years of experience in the field or in a related area. Familiar with a variety of the field's concepts, practices, and procedures. Relies on experience and judgment to plan and accomplish goals. Performs a variety of complicated tasks. May lead and direct the work of others. A wide degree of creativity and latitude is expected. Typically reports to a head of a unit/department.	\$133,216	\$64.05	Salary.com

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

Private Banker I	Manages a private banking portfolio of individuals with high-net worth. Responsible for accomplishing deposit and loan volume goals through customer service and adhering to policies and procedures. May require a bachelor's degree and 0-2 years of experience in the field or in a related area. Familiar with standard concepts, practices, and procedures within a particular field. Relies on limited experience and judgment to plan and accomplish goals. Performs a variety of tasks. Works under general supervision. A certain degree of creativity and latitude is required. Typically reports to a supervisor or manager.	\$94,133	\$45.26	Salary.com
Private Banker II	Manages a private banking portfolio of individuals with high net-worth. Responsible for accomplishing deposit and loan volume goals through customer service and adhering to policies and procedures. May require a bachelor's degree and 2-4 years of experience in the field or in a related area. Familiar with standard concepts, practices, and procedures within a particular field. Relies on limited experience and judgment to plan and accomplish goals. Performs a variety of tasks. Works under general supervision. A certain degree of creativity and latitude is required. Typically reports to a supervisor or manager.	\$118,267	\$56.86	Salary.com
Private Banker III	Manages a private banking portfolio of individuals with high-net worth. Responsible for accomplishing deposit and loan volume goals through customer service and adhering to policies and procedures. May require a bachelor's degree and at least 5 years of experience in the field or in a related area. Familiar with standard concepts, practices, and procedures within a particular field. Relies on experience and judgment to plan and accomplish goals. Performs a variety of tasks. Works under general supervision. A certain degree of creativity and latitude is required. Typically reports to a manager.	\$156,515	\$74.25	Salary.com
Accounting Manager	Responsible for managing the general accounting function. Oversees the completion of ledger accounts and financial statements. Evaluates and makes appropriate improvements to internal accounting processes ensuring that practices are in line with the overall goals of the organization. Designation of CPA may be required. Requires a bachelor's degree in area of specialty and at least 7 years of experience in the field or in a related area. Familiar with a variety of the field's concepts, practices, and procedures. Relies on extensive experience and judgment to plan and accomplish goals. Performs a variety of tasks. Leads and directs the work of others. A wide degree of creativity and latitude is expected. Typically reports to top management.	\$122,672	\$58.98	Salary.com
Controller	Responsible for directing an organization's accounting functions. These functions include establishing and maintaining the organization's accounting principles, practices, procedures, and initiatives. Prepares financial reports and presents findings and recommendations to top management. Requires a bachelor's degree and at least 15 years of direct experience in the field. Typically requires a CPA. Demonstrates expertise in a variety of the field's concepts, practices, and procedures. Relies on extensive experience and judgment to plan and accomplish goals.	\$277,409	\$133.37	Salary.com

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

	Performs a variety of tasks. Leads and directs the work of others. A wide degree of creativity and latitude is expected. Typically reports to top financial officer or CEO.			
Investor Relations Administrator	Maintains communications with shareholders of an organization and answers shareholder inquiries. Establishes relationships with shareholders that reflect positively on the company's stock price. Requires a bachelor's degree and 0-2 years of experience in the field or in a related area. Has knowledge of commonly-used concepts, practices, and procedures within a particular field. Relies on instructions and pre-established guidelines to perform the functions of the job. Works under immediate supervision. Primary job functions do not typically require exercising independent judgment. Typically reports to a supervisor or manager.	\$108,058	\$51.95	Salary.com
Investor Relations Director	Directs and oversees an organization's investor relations function. Communicates with shareholders and/or the general financial community to develop and maintain positive relationships. Implements strategies to ensure the organization's relationships with shareholders reflect positively on the company's stock price. Requires a bachelor's degree with at least 10 years of experience in the field. Familiar with a variety of the field's concepts, practices, and procedures. Relies on extensive experience and judgment to plan and accomplish goals. Performs a variety of tasks. Leads and directs the work of others. A wide degree of creativity and latitude is expected. Typically reports to top management.	\$235,299	\$113.12	Salary.com
Intellectual Property Attorney I	Responsible for preparing legal documents, reviewing company policies and litigating matters regarding intellectual property. May be responsible for preparing patent or trademark documents, licensing agreements, service agreements, transfer agreements and other contracts or agreements as necessary. Aids in protecting the organization's assets in the area of intellectual property. Requires a JD with 0-2 years of experience in the field or in a related area. Familiar with standard concepts, practices, and procedures within a particular field. Relies on experience and judgment to plan and accomplish goals. Performs a variety of tasks. Works under general supervision. A certain degree of creativity and latitude is required. Typically reports to a manager.	\$206,714	\$99.38	Salary.com
Intellectual Property Attorney II	Responsible for preparing legal documents, reviewing company policies and litigating matters regarding intellectual property. May be responsible for preparing patent or trademark documents, licensing agreements, service agreements, transfer agreements and other contracts or agreements as necessary. Protects the organization's assets in the area of intellectual property. Requires a JD with 2-4 years of experience in the field or in a related area. Familiar with a variety of the field's concepts,	\$225,815	\$108.56	Salary.com

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

	practices, and procedures. Relies on experience and judgment to plan and accomplish goals. Performs a variety of tasks. A wide degree of creativity and latitude is expected. Typically reports to a manager.			
Intellectual Property Attorney III	Responsible for preparing legal documents, reviewing company policies and litigating matters regarding intellectual property. May be responsible for preparing patent or trademark documents, licensing agreements, service agreements, transfer agreements and other contracts or agreements as necessary. Protects the organization's assets in the area of intellectual property and may provide risk or legal counseling to upper management. Requires a JD with 4-6 years of experience in the field or in a related area. Familiar with a variety of the field's concepts, practices, and procedures. Relies on extensive experience and judgment to plan and accomplish goals. Performs a variety of tasks. May lead and direct the work of others. A wide degree of creativity and latitude is expected. Typically reports a manager.	\$266,351	\$128.05	Salary.com
Intellectual Property Attorney IV	Responsible for preparing legal documents, reviewing company policies and litigating matters regarding intellectual property. May be responsible for preparing patent or trademark documents, licensing agreements, service agreements, transfer agreements and other contracts or agreements as necessary. Protects the organization's assets in the area of intellectual property and may provide risk or legal counseling to upper management. Requires a JD and at least 6 years of experience in the field or in a related area. Familiar with a variety of the field's concepts, practices, and procedures. Relies on extensive experience and judgment to plan and accomplish goals. Performs a variety of tasks. Leads and directs the work of others. A wide degree of creativity and latitude is expected. Typically reports to a manager.	\$297,261	\$142.91	Salary.com
IT Procurement Administrator	Directs the daily activities of the technology purchasing function. Reviews technology purchasing decisions, orders, and vendor contracts. Oversees the ordering of materials and supplies from vendors. Researches, interviews, and negotiates with suppliers to obtain prices and specifications. Creates purchase orders for the acquisition of materials and performs related administrative tasks. May require a bachelor's degree in area of specialty and 0-2 years of experience in the field or in a related area. Familiar with a variety of the field's concepts, practices, and procedures. Relies on experience and judgment to plan and accomplish goals. Performs a variety of tasks. A certain degree of creativity and latitude is expected. Typically reports to a supervisor or manager.	\$89,312	\$42.94	Salary.com

ORANGE COUNTY / INLAND EMPIRE SBDC NETWORK POLICIES & PROCEDURES

APPENDIX J: On-Site SBDC Center Review Worksheet

Center: _____

Grant Period Covered: _____

Date of Review: _____

Name of Reviewer: _____

Name and Title of Center Employees Interviewed: Months Reviewed: _____

	<i>Federal Funds</i>	<i>Match Funds</i>
<i>Accounts Reviewed:</i>	_____	_____
	_____	_____

Invoices

(insert ✓ if OK)

- | | | |
|---|-------|-------|
| a) Monthly amounts match institutions ledger summary | _____ | _____ |
| b) Year-end totals match cumulative amounts on final | _____ | _____ |
| c) Line item totals are within 10% re-budgeting allowance
or re-budget request is on file and approved | _____ | _____ |

Exceptions Noted: _____

Time and Effort Reporting

- | | | |
|--|-------|-------|
| (a) All employees sign a T&E report or timesheet? | _____ | _____ |
| (b) Distribution by percentage of effort recorded? | _____ | _____ |
| (c) Correlation between effort recorded | | |