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SMALL BUSINESS

**The Small Business
Administration's Progress
in Restructuring Its Business
Development Program**

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regulations and guidelines; SBA's latest estimate for completing the redesign work is late 1995, 5 years later than it originally estimated; and SBA has yet to develop an estimate of the total cost for the system's redesign. Without such a system, the Congress and program managers cannot determine what assistance is being provided to 8(a) firms, assess its effectiveness, or most importantly, assess the 8(a) program's overall effectiveness in developing 8(a) firms. The need for basic information on program accomplishments has been reinforced with the recent enactment of the Government Performance and Results Act of 1993. This legislation requires all federal agencies to develop the information necessary to make objective evaluations of program performance.

In addition, SBA's certification of 8(a) program participants continues to exceed the 90 days mandated in the act, averaging 170 days in fiscal year 1992. Most 8(a) firms have new or revised business plans approved by SBA, but SBA is not annually reviewing each approved business plan as required by the act. And while the value of 8(a) contracts awarded competitively during fiscal year 1992 exceeded the combined values of the prior 2 fiscal years, the distribution of 8(a) contracts continues to be concentrated in a very small percentage of 8(a) firms.

In addition, while SBA has improved its tracking and acquisition of management and technical assistance provided to 8(a) firms, it still needs to develop criteria for measuring the effectiveness of such assistance. Finally, while SBA tracks the principal SBA programs that provide financial assistance to 8(a) firms, it still does not know the full extent of financial assistance provided to 8(a) firms by all SBA programs.

BACKGROUND

The 8(a) program is administered by SBA's Office of Minority Small Business and Capital Ownership Development. As of May 1993, there were 4,483 active 8(a) firms in the program. In fiscal year 1992, the 8(a) program provided 4,693 new 8(a) contracts and 16,578 contract modifications to new and existing 8(a) contracts, together totaling \$3.67 billion, to 8(a) firms.

The 8(a) program is the federal government's principal vehicle for developing small businesses that are owned by minorities and other socially and economically disadvantaged individuals. Since the late 1960s--when SBA first used the 8(a) program's authority to provide jobs in distressed urban areas--the 8(a) program has evolved from one of creating jobs to one of developing firms owned by socially and economically disadvantaged individuals into viable businesses. Toward this end, the Congress has made three major legislative attempts--in 1978, 1980, and 1988--to improve SBA's administration of the 8(a) program and to emphasize its business development aspects.

Mr. Chairman and Members of the Committee:

We are pleased to be here to discuss our report that you are releasing today on the Small Business Administration's (SBA) progress in implementing changes to its 8(a) business development program that were mandated by the Business Opportunity Development Reform Act of 1988 and subsequent amendments.¹ As you know, the goal of the 8(a) program is to promote the development of small businesses that are owned and controlled by socially and economically disadvantaged individuals.

The Congress enacted this act² because the 8(a) program was not developing firms owned by socially and economically disadvantaged individuals into viable businesses. The Congress noted that gaining access to the 8(a) program was a lengthy and burdensome process, program administration was inefficient, and few firms were able to compete successfully in the open market upon leaving the 8(a) program. To remedy these problems, the act made a number of changes to improve the 8(a) program's organization and participation standards, business development activities, and overall management. These changes included requiring that SBA (1) develop and implement a process for systematically collecting 8(a) program data; (2) annually report to the Congress on the program's status and accomplishments; (3) process 8(a) program applications within 90 days; (4) obtain revised business plans from 8(a) firms so that SBA can better monitor their development; (5) annually review each business plan and, with the 8(a) firm, modify the plan accordingly to help the firm achieve its business development goals; and (6) competitively award 8(a) contracts which exceed a certain dollar threshold.

As you will recall, Mr. Chairman, we testified before this Committee in March 1992 regarding the difficulties that SBA was having in implementing the legislative changes, and the agency's lack of reliable program data needed to effectively manage the 8(a) program.³ Because of these problems, you requested at that hearing that we continue to assess SBA's efforts to implement the mandated program provisions.

In summary, while SBA has made progress in implementing some program changes, it continues to have difficulty in implementing others. SBA did not plan the redesign of the 8(a) program's management information system in accordance with federal

¹Small Business: Problems Continue With SBA's Minority Business Development Program (GAO/RCED-93-145, Sept.17, 1993).

²The "act" refers to both the 1988 legislation and subsequent technical amendments enacted in June 1989.

³For a transcript of our testimony, see Small Business: The Small Business Administration's Progress in Restructuring Its 8(a) Business Development Program (GAO/T-RCED-92-35).

estimated in 1989 that the redesign of the 8(a) management information system would be completed in 1990. In June 1993, SBA officials estimated that it would take until late 1995 before the system's redesign is complete. Contract costs for developing the second phase of the system's redesign increased by more than 240 percent--from about \$120,000 to over \$418,000--during fiscal year 1992. The contractor responsible for developing this phase repeatedly cited SBA's failure to define users' requirements for the system as an impediment to its development. As of June 1993, SBA had no estimate of the total cost of redesigning this system.

The act also requires SBA to report to the Congress by April 30 of each year on the status of 8(a) firms and the 8(a) program's accomplishments during the previous fiscal year. The first report, due in April 1991 and covering fiscal year 1990 activities, was not submitted to the Congress until October 1991. SBA's fiscal year 1991 report was not submitted until November 1992. SBA did not submit the report for fiscal year 1992 until the end of July 1993. According to SBA, the delays occurred because the 8(a) management information system did not include data needed to meet the reporting requirements and SBA had to query its field offices for the data.

CERTIFICATION OF 8(a) PROGRAM PARTICIPANTS
CONTINUES TO TAKE LONGER THAN THE ACT ALLOWS

In an effort to improve access to the 8(a) program, the act requires SBA to process each application and decide on an applicant's eligibility for the 8(a) program within 90 days of receiving a completed application. In 1992, we reported that (1) only 24 percent of the applications processed during the first 11 months of 1990 met the mandated time frame, (2) SBA was averaging 117 days to process an application, and (3) SBA was unable to determine where delays were occurring because of missing data in its manual application-tracking system.

SBA continues to have difficulty meeting the act's 90-day processing requirement. During fiscal year 1992, SBA completed the processing of and decided on 846 8(a) program applications. Our analysis showed that SBA took an average of 170 days to decide whether to approve or decline each of these applications. Of the 846 applications, only 68, or about 8 percent, were processed in 90 days or less. At the same time, 531 applications, or about 63 percent, took at least 151 days to process. (App. I of this testimony shows the processing times for the 846 applications.) According to SBA, of the 554 8(a) program applications in processing as of late May 1993, 231, or 42 percent, had already exceeded the 90-day requirement.

In 1992, we reported that SBA was developing an automated system to track 8(a) program applications. We recommended that SBA fully implement the system and use it to identify where and why

Over the years, reports by us, SBA's Inspector General, and others have shown that SBA has continually had problems in administering the 8(a) program. These reports have made numerous recommendations to improve SBA's administration of the 8(a) program. However, most recently, a report issued by the U.S. Commission on Minority Business Development concluded that no more could be done to correct SBA's lax responsibility toward the 8(a) program and recommended that most of SBA's 8(a) program authorities be transferred to a new agency, which would need to be created by statute, in the Department of Commerce.⁴ The report stated that SBA's lack of progress with regard to the 8(a) program is due more to an institutional aversion to the minority business programs than to some chronic resource limitation.

REDESIGN OF THE 8(a) PROGRAM'S MANAGEMENT
INFORMATION SYSTEM NOT PROPERLY PLANNED

The act requires that SBA develop a systematic data collection process and report annually to the Congress on the 8(a) program's status and accomplishments. In 1992, we reported that SBA's management information system for the 8(a) program did not provide SBA with the data needed to effectively manage the program or to meet the act's reporting requirements.⁵ We also reported that SBA recognized the inadequacies of the system and had begun a four-step approach to redesign the 8(a) program's management information system.

However, our followup work shows that much of SBA's initial efforts to redesign the system were not planned in accordance with federal regulations and guidelines. Specifically, (1) a needs determination that defines the requirements of the system in relation to the agency's mission was not completed; (2) an analysis of the various alternative designs for the system, including the costs and benefits of each, was not performed according to federal requirements; and (3) SBA's overall plan for implementing the system did not outline software, hardware, and telecommunications requirements; describe how the related systems would be interfaced and integrated; or provide a schedule and cost estimate for the redesign effort. As a result, SBA does not know how much the redesign will cost and has little assurance that the alternative it selected is the most cost-effective.

In addition, the lack of proper planning has helped to delay SBA's implementation of the 8(a) program's management information system and to increase the system's costs. SBA originally

⁴United States Commission on Minority Business Development--Final Report (Wash., D.C., 1992).

⁵Small Business: Problems in Restructuring SBA's Minority Business Development Program (GAO/RCED-92-68, Jan. 31, 1992).

relatively new to the 8(a) program, not receiving 8(a) contracts, or in the process of being terminated from the 8(a) program.

Our review of files for 71 randomly selected 8(a) firms located in four district offices in SBA's Regions III and VI showed that 66 of the firms had new or revised business plans approved by SBA. Specifically, all 26 8(a) firms in the New Orleans and San Antonio District Offices, 27 of the 30 8(a) firms in the Washington, D.C. District Office, and 13 of the 15 8(a) firms in the Philadelphia District Office had approved business plans. None of the five firms without approved business plans had received 8(a) contracts during fiscal years 1991 and 1992. The files also showed that SBA had informed firms that remedial measures would be taken if the firms did not submit business plans. For example, the Philadelphia District Office threatened to terminate two of the firms in our sample from the 8(a) program for not submitting business plans. During our review, one of the firms submitted its plan and SBA approved it, but the other had not submitted a plan.

However, our file review also showed that SBA is not annually reviewing approved business plans, as required by the act. In addition, the emphasis given to the annual reviews varied between SBA offices. SBA had not conducted annual reviews of the business plans for 8 of the 15 8(a) firms in the Philadelphia District Office and 10 of the 30 8(a) firms in the Washington, D.C., District Office. SBA officials in these offices stated that staff had placed a low priority on such reviews. Conversely, SBA had conducted annual business plan reviews for 11 of the 13 8(a) firms in the San Antonio District Office and all 13 of the 8(a) firms in the New Orleans District Office. Unless it annually reviews the business plan of each 8(a) firm, SBA has little or no assurance that the business development goals in the plan remain realistic.

MORE 8(a) CONTRACTS AWARDED COMPETITIVELY,
BUT 8(a) CONTRACTS STILL CONCENTRATED IN
SMALL PERCENTAGE OF FIRMS

To help develop 8(a) firms and better prepare them to compete in the commercial marketplace after the firms leave the 8(a) program, the act mandated that 8(a) program contracts must be awarded competitively when the total contract price, including the estimated value of contract options, exceeds \$5 million for manufacturing contracts or \$3 million for all other contracts. In 1992, we reported that, of the approximately 8,300 new 8(a) contracts awarded in fiscal years 1990 and 1991, totaling \$3 billion, 67 contracts, totaling \$136 million, were awarded competitively. We also reported that we could not determine the number of new 8(a) contracts that should have been awarded competitively because the 8(a) program's management information system did not record the total estimated values of 8(a) contract options that might be exercised in the future.

application processing delays are occurring, and work to meet the mandated 90-day processing requirement.

Although in responding to our recommendation in July 1992, SBA stated that the new system could identify where and why processing delays were occurring, our followup work shows that the system still is not capable of producing standard reports that provide SBA with such information. Since January 1992, SBA's emphasis has been on entering application information into the system in order to build a data base. SBA plans to incorporate a reporting capability into the system that will routinely track and provide standard reports on application processing, but because of other ongoing system redesign work, SBA estimates that work will not begin on this effort until sometime in fiscal year 1994. Until SBA builds such a reporting capability into its 8(a) program application-tracking system, it will not be able to routinely identify and deal with application-processing delays on a day-to-day basis.

Despite the automated application-tracking system's lack of a reporting capability, SBA officials maintain that they are aware of where the application-processing delays are occurring and are considering organizational changes that are designed, in part, to decrease application-processing times. SBA has already restructured the 8(a) application-review process in its central office and reduced the overall number of application reviews. SBA is also considering eliminating its field offices from the application-review process, and consolidating all 8(a) program application-review functions at the central-office level.

NOT ALL BUSINESS PLANS REVIEWED ANNUALLY

The act gave increased importance to the business plan as a tool to aid an 8(a) firm's development by requiring that each plan, among other things, analyze the firm's strengths and weaknesses, set forth its business development goals and objectives, and estimate its future 8(a) and non-8(a) contract activity. The act further directed that (1) for any firm entering the 8(a) program after June 1, 1989, SBA approve the firm's business plan before the firm becomes eligible for contracts and (2) SBA annually review each business plan with the firm and modify the plan, as needed, to make sure that the firm's business development goals are realistic and to help the firm achieve them.

The number of firms in the 8(a) program with approved business plans has increased. In 1992, we reported that SBA had reviewed and approved business plans for 2,250 firms, or 57 percent, of the 3,922 firms in the 8(a) program as of October 1, 1991. The latest data available from SBA showed that, as of November 30, 1992, 3,564 firms, or about 88 percent, of the 4,071 firms in the 8(a) program at that time had new or revised business plans approved by SBA. According to SBA officials, the remaining 12 percent were either

firms in performing work on a specific contract. Firms in the 8(a) program can receive other forms of financial assistance, including equity capital and loans from SBA-sponsored investment companies, and microloans from SBA-sponsored development companies.

In 1992, we reported that we were unable to determine the full extent of financial assistance provided to 8(a) firms because SBA did not have a system for identifying all forms of financial assistance provided to them. Therefore, we recommended that SBA determine the amount of loans and other forms of financial assistance provided to 8(a) firms.

In response to our report, SBA modified its loan-accounting system in June 1992 to track 7(a) guaranteed general business loans made to 8(a) firms. SBA data showed that, between June 1992 and May 1993, 52 guaranteed general business loans--valued at about \$14.5 million--were made to 8(a) firms.

In fiscal year 1992, SBA made 30 8(a) direct loans valued at about \$4.7 million. As of May 1993, SBA had made 19 8(a) direct loans valued at \$3.3 million for fiscal year 1993. Also, in fiscal year 1992, SBA disbursed \$10.1 million in advance payments to 8(a) firms. According to SBA, it discontinued making advance payments in fiscal year 1993 because of congressional concerns regarding its authority to provide such assistance.

Small Business Investment Companies (SBIC), which are privately owned investment firms licensed and regulated by SBA, use their own and borrowed funds to provide equity capital, long-term loans, and other assistance to qualifying small businesses, including 8(a) firms. Much like SBICs, Specialized Small Business Investment Companies (SSBIC) invest in small businesses owned by socially or economically disadvantaged entrepreneurs. In fiscal year 1992, SBICs invested about \$1 billion in small businesses, while SSBICs invested about \$443 million. As of May 1993, SBICs had invested about \$974 million and SSBICs had invested about \$456 million in small businesses for fiscal year 1993. SBA does not have a mechanism for identifying SBIC or SSBIC assistance provided to 8(a) firms.

SBA's microloan program, authorized as a pilot project in October 1991, provides financial assistance to very small businesses, especially those owned by minorities, women, and low-income individuals who are unable to get credit in amounts that most commercial lenders consider too small--\$25,000 or less. In fiscal year 1992, SBA disbursed \$12.7 million to community-based nonprofit organizations to make microloans to eligible small businesses. As of May 1993, SBA had disbursed about \$20.5 million to these organizations for fiscal year 1993. However, SBA does not have a system for identifying the number or dollar amount of microloans made to 8(a) firms. Without information on the assistance provided to 8(a) firms through the microloan, SBIC, and

and SBA's criteria to measure the effectiveness of such assistance. While 8(a) firms, as small businesses, are eligible to receive management and technical assistance from various sources to aid their development, SBA's primary source of such assistance for 8(a) firms is its 7(j) program. Under the 7(j) program, SBA hires contractors to conduct seminars and provide one-on-one assistance to 8(a) firms and other small businesses. In fiscal year 1992, SBA provided about \$7.8 million in 7(j) assistance to 2,754 firms.

In 1992, we reported that SBA did not track the amount and type of assistance provided to 8(a) firms under each of the 16 specialized categories of 7(j) assistance. Consequently, when SBA contracted for 7(j) assistance to be provided under each category during the next fiscal year, it had no assurance that the assistance being procured would be in line with or meet the needs of the 8(a) firms. We also reported that SBA had not developed objective criteria for measuring the effectiveness of 7(j) assistance but instead relied on indicators, such as reports from providers describing the nature of the 7(j) assistance provided, to measure its effectiveness.

SBA has taken several steps to improve its tracking and acquisition of 7(j) assistance. During fiscal year 1992, SBA requested that each field office determine its 7(j) management and technical assistance requirements for fiscal year 1993 on the basis of its 8(a) firms' needs. SBA used these data to make adjustments to its fiscal year 1993 7(j) assistance request and in its subsequent allotments to SBA field offices. In addition, in September 1992, SBA entered into a year-long contract, valued at approximately \$100,000, for the development of an automated system to record, track, and report on the delivery of 7(j) assistance to 8(a) and other small firms. In November 1992, SBA directed its 10 regional offices to provide monthly information to SBA headquarters on the amount of assistance provided under each category of 7(j) management and technical assistance. While the automated system is being developed, SBA is continuing to manually compile the data that the field offices submit on 7(j) assistance.

In early July 1993, SBA entered into a contract, valued at \$197,000, for the development of criteria and a program for assessing the effectiveness of 7(j) assistance. The contract provides for the contractor to make an initial presentation to SBA on such criteria and program around mid-October 1993.

EXTENT OF FINANCIAL ASSISTANCE
PROVIDED TO 8(a) FIRMS NOT FULLY KNOWN

The act also directed us to report on the amount and type of financial assistance provided to 8(a) firms by SBA. SBA's principal forms of financial assistance for 8(a) firms are 7(a) guaranteed general business loans, 8(a) direct loans, and 8(a) advance payments, which are cash advances from SBA to assist 8(a)

percent of the total value of all 8(a) IDIQ contracts awarded during the 2 fiscal years. Of the 173 contracts, 21, totaling about \$434 million, were competitively awarded and 152 contracts, totaling about \$966 million, were not competitively awarded.

According to SBA, the IDIQ minimum-value provision in its 8(a) program regulations is intended to protect the 8(a) contractor from over committing financial, personnel, and other resources to meet IDIQ contract requirements that may never materialize. However, SBA officials conceded that a procuring agency could inappropriately classify a contract as an IDIQ contract, with the result being that the contract would not be awarded competitively.

The distribution of 8(a) contracts among a relatively few firms is a long-standing condition that continued during fiscal year 1992. As early as 1981, we reported that, on average, 50 8(a) firms annually received about 31 percent of all 8(a) contract awards over a 12-year period.⁷ In May 1988, we reported that 50 firms received about \$1.1 billion, or about 35 percent of the value of 8(a) contracts awarded during fiscal year 1987.⁸ Our January 1992 report noted that, of the 3,645 firms in the 8(a) program at the end of fiscal year 1990, 50, or less than 2 percent, received about \$1.5 billion, or 40 percent of the nearly \$4 billion in 8(a) contracts awarded during the fiscal year. SBA data showed that of the 4,291 firms in the 8(a) program at the end of fiscal year 1992, 50, or less than 2 percent, received about \$1.15 billion, or about 31 percent of the \$3.67 billion in 8(a) contracts and 8(a) contract modifications awarded during the fiscal year.

Conversely, many 8(a) firms continue to receive no contracts. According to SBA, of the 3,645 firms in the 8(a) program at the end of fiscal year 1990, 1,914, or about 53 percent, did not receive any 8(a) program contracts during the fiscal year. During fiscal year 1991, 2,155 firms, or 55 percent of the 3,922 firms in the 8(a) program at the end of the fiscal year, did not receive any contracts through the 8(a) program. SBA data showed that during fiscal year 1992, 2,327 firms, or 54 percent of the 4,291 firms in the 8(a) program at the end of the fiscal year, did not receive any 8(a) contracts.

IMPROVEMENTS MADE IN TRACKING AND ACQUISITION OF MANAGEMENT AND TECHNICAL ASSISTANCE

The act directed us to report on the amount and type of management and technical assistance that SBA provided to 8(a) firms

⁷The SBA 8(a) Procurement Program--A Promise Unfilled (CED-81-55, Apr. 18, 1981).

⁸Small Business Administration: Status, Operations, and Views on the 8(a) Procurement Program (GAO/RCED-88-148BR, May 24, 1988).

The dollar value of 8(a) contracts that were awarded competitively during fiscal year 1992 exceeded the combined dollar values of 8(a) contracts that were awarded competitively during fiscal years 1990 and 1991. SBA data showed that of the 4,693 new 8(a) contracts awarded in fiscal year 1992, totaling about \$1.7 billion, 139 contracts, totaling about \$343.4 million, were awarded competitively. This represents about 3 percent of the new 8(a) contracts awarded in fiscal year 1992 and about 20 percent of the new 8(a) contract dollars. We were unable to determine how many of the new 8(a) contracts awarded in fiscal year 1992 should have been awarded competitively because the 8(a) program's management information system still does not record the total estimated cost of 8(a) contracts, including the value of any 8(a) contract options.

As part of our work involving the competitive award of 8(a) program contracts, we determined the extent to which indefinite delivery, indefinite quantity (IDIQ) contracts in the 8(a) program were being awarded competitively. This type of contract is used when a procuring agency does not know the precise quantity of supplies or services to be provided under the contract and, consequently, is able to estimate only the minimum value of the contract. As the agency identifies a specific need for goods or services, the IDIQ contract is modified to reflect the actual costs associated with the goods or services. When an agency classifies an 8(a) contract as an IDIQ contract, SBA regulations require that the agency consider only the guaranteed minimum value of the contract in deciding whether the contract meets the 8(a) program's competition thresholds and should be competitively awarded. The total estimated or actual lifetime value of an IDIQ contract is not considered in determining whether the contract is subject to competition as it is with other contractual methods.

SBA's 8(a) program management information system does not identify which 8(a) contracts are IDIQ contracts. However, using data obtained from the Federal Procurement Data System,⁶ we determined that in fiscal years 1991 and 1992, 8(a) IDIQ contracts whose values eventually exceeded the competition thresholds were few in number but they accounted for one-half of the total dollar amount of all IDIQ contracts awarded. In these 2 fiscal years, federal agencies awarded 2,872 IDIQ contracts to 8(a) firms. As of May 1993, these contracts had a total value, including modifications, of about \$2.8 billion. Of these contracts, 173 with a total value of about \$1.4 billion ultimately exceeded the competitive thresholds. Although the 173 contracts accounted for only about 6 percent of all IDIQ contracts, they accounted for 50

⁶The Federal Procurement Data System, operated by the Federal Procurement Data Center, collects, develops, and disseminates federal procurement data to the Congress, the executive branch, and the private sector.

Mr. Chairman, this concludes my prepared statement. I would be glad to respond to any questions that you or members of the Committee may have.

SSBIC programs, SBA cannot provide the Congress or the public with information on the full extent of financial assistance provided to 8(a) firms.

CONCLUSIONS AND RECOMMENDATIONS

Mr. Chairman, more than a year has passed since we testified on the problems SBA had in implementing mandated changes to its 8(a) program. While SBA has made some progress, it continues to have difficulty in managing the 8(a) program so that it meets the requirements of the 1988 act. The 8(a) program still needs a management information system, developed in accordance with federal regulations and guidelines, that provides complete and accurate information on all aspects of the program. Without such a system, the Congress and program managers cannot determine what assistance is being provided to 8(a) firms, assess its effectiveness, or most importantly, assess the 8(a) program's success in developing 8(a) firms. Access to the 8(a) program still needs to be improved. SBA must provide 8(a) program applicants with timely feedback on their eligibility to participate in the program, but it continues to lack an 8(a) program application-tracking system that can provide timely information on where and why application processing problems are occurring. Finally, SBA must periodically review the business plan of each 8(a) firm. Without such a review, SBA is hampered in its ability to ensure that each plan is up-to-date, that the 8(a) firm's business development goals are realistic, and most importantly, that the firm is progressing toward achieving these goals.

In view of SBA's progress since our January 1992 report, we believe that the recommendations we made in that report that SBA (1) fully implement its automated 8(a) program application-tracking system and work to meet the 90-day processing time frame and (2) determine the amounts of financial assistance provided to 8(a) firms by all SBA programs continue to be valid and should be implemented. In addition, our latest report (GAO/RCED-93-145) recommends that the Administrator, SBA, direct the Associate Administrator, Minority Small Business and Capital Ownership Development, to

- complete and analyze users' requirements for the 8(a) program's management information system, document the system's design, and complete the system's implementation plan, all in accordance with federal regulations and guidelines, and
- direct SBA field offices to annually review each approved business plan, as required by the act.

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ELAPSED TIMES FOR THE 846 8(A) APPLICATIONS
PROCESSED DURING FISCAL YEAR 1992

Number of days	Number of applications	Percent of applications
90 days and less	68	8.0
91 to 120	100	11.8
121 to 150	147	17.4
151 to 180	191	22.6
181 to 210	174	20.6
More than 210	166	19.6
Total	846	100.0

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