

# Small Businesses and E-Rulemaking



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# Areas of Focus

- Who is NFIB?
- Importance of E-Rulemaking
- An Appraisal of the Problem
- Constraints Facing Small Business
- The NFIB Research Foundation Survey
- Where Next

# Who is NFIB?

- Nation's Largest Small Business Trade Association
- Great Breadth of Membership and Scope of Outreach
- Members Representing All Manner of Trades
- Average size is 5-9 Employees

**NFIB's Constituents Provide 60% of New Jobs!**

# Member Regulatory Concerns

- Figuring Out What Needs to Be Done
- Sheer Amount of Paperwork
- Time Spent Filling Out Paperwork
- Environmental Concerns are of Paramount importance to our members.
- But not one reg in particular....

Our Members See Regulation as “Death by a Thousand Pinpricks”

# An Appraisal of the Problem

- The Current Regulatory Burden
- Small Businesses Are Different Than Big Businesses

# The Current Regulatory Burden

- Scope of Regulations Impacting Small Business Is Vast
- Cannot Even Assess Number of Criminal Statutes on the Books
- Costs Calculated by SBA's Office of Advocacy as nearly \$7,000 per employee  
**PER YEAR!**

# Small Businesses Are Different Than Big Businesses

- Regulatory Costs Are Higher
- Don't Have the Personnel of larger firms
- Don't Have Access to State-of-The-Art Equipment
- Cannot Readily Hire Expertise

# Electronic Assistance

- E-Rulemaking
- Business Compliance One-Stop

Eliminating Paperwork is of  
Tremendous Import

# Constraints For Small Entities: Time And Energy

## NFIB Research Foundation Survey

- Conducted Last Year
- Survey of Small Business Owners  
Generally

# Findings

- Owners Most Frequently Do Paperwork
- Average Cost Per Hour is \$48.72
- Most Use Both Computers and Paper for Recordkeeping and Filing
- Computer Use is Growing, now at 92%

# Problems With Paperwork

- Unclear and Confusing Instructions
- Volume Itself
- Duplicative Requests
- Maintenance of Records
- Requests for Non-Existent or Inaccessible Information

# Thus An Economic Problem

- Already Spending Considerable Amounts of Time Doing Paperwork
- Therefore An Opportunity Cost Situation Arises

Here's An Example:

# Lead TRI

The New Requirements for Reporting  
Lead Usage under the  
Toxics Release Inventory  
Were Estimated to Consume  
**60 Hours**  
For First Time Filers

# In Real Terms

Normal Work Week: 40 Hours

Time for Lead TRI: 60 Hours

Time Lost for Lead TRI:

**A Full Week and a Half!!!**

(And that's Just for One Reg Folks!)

# The Reality of The Rubber Hitting the Road

- Business Owners Too Tired or Overwhelmed to Properly Comment
- Will Comment Only On Important Issues, and then when it is easy to do
- Thus, the importance of Trade Associations in the process

# Conclusion: How Can We Get More Involvement?

- Cut Paperwork Burdens
- Encourage Greater Partnership with Agencies (The SBA-EPA-Farm Diesel Example)

Hearty and Interested Parties Will Participate,  
But Easing Burdens and Fostering More  
Partnerships Will Help

# Oh, and One More Thing...

## Two More Suggestions for Regulations.Gov

1. Have a Listing Of All Regs Opened for Comment in Previous 7 Days
2. Have a Listing of All Regs for Which Comments Are Due in the Coming Week (or Two)

THANK YOU!

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