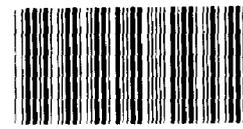


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BY THE U.S. GENERAL ACCOUNTING OFFICE
**Report To The Administrator
Small Business Administration**

**Need To Determine Whether Existing
Federal Programs Can Meet The
Needs Of Women Entrepreneurs**

The Small Business Administration and the Interagency Committee on Women's Business Enterprise have not determined whether existing Federal business assistance programs can meet the needs of women entrepreneurs. Rather, SBA and the Committee have concentrated on conceptualizing new programs for women. This emphasis on new programs is premature since the adequacy of existing programs has not been assessed. Accordingly, GAO is recommending that



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- SBA evaluate its programs to determine whether they are or can be made responsive to women and
- the Interagency Committee provide more explicit guidance to Federal agencies for using their resources to meet the needs of women business owners.



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APRIL 30, 1981

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UNITED STATES GENERAL ACCOUNTING OFFICE
WASHINGTON, D.C. 20548

COMMUNITY AND ECONOMIC
DEVELOPMENT DIVISION

B-202765

The Honorable Michael Cardenas
Administrator
Small Business Administration

Dear Mr. Cardenas:

This report describes actions taken by the Small Business Administration and the Interagency Committee on Women's Business Enterprise to promote women entrepreneurs and suggests ways to improve such activities. We made our review because of the recent interest, both in the public and private sectors, in furthering the development of women business owners.

This report contains recommendations to you on pages 14 and 19. As you know, section 236 of the Legislative Reorganization Act of 1970 requires the head of a Federal agency to submit a written statement on actions taken on our recommendations to the Senate Committee on Governmental Affairs and the House Committee on Government Operations not later than 60 days after the date of the report and to the House and Senate Committees on Appropriations with the agency's first request for appropriations made more than 60 days after the date of the report.

We are sending copies of this report to the committees cited above as well as to the House and Senate Small Business Committees. Copies are also being sent to your Inspector General; your Associate Administrator, Women's Business Enterprise Division; and to members of the Interagency Committee.

Sincerely yours,

A handwritten signature in cursive script that reads "Henry Eschwege".

Henry Eschwege
Director

D I G E S T

The Small Business Administration and the Interagency Committee on Women's Business Enterprise have not given enough attention to using existing SBA and other Federal resources to meet the needs of women entrepreneurs. Instead, their attention has been directed to designing new programs rather than to determining whether existing Federal programs are or could be made responsive to women business owners.

In the mid-1970s, women business owners and women's organizations cited a number of issues and problems concerning the difficulties women experience in establishing a business. These problems were raised both in reports and in congressional testimony. In GAO's judgment, many of the problems cited are characteristic of small businesses and are not unique to women entrepreneurs. For example, limitations in capital, management and technical skills, and product marketability affect many small firms. On the other hand, social prejudices that were also identified, such as a credibility gap with contractors and bank loan officers, have undoubtedly intensified these problems for some women. However, because the extent and impact of these prejudices cannot be measured, it becomes a subjective decision as to what action the Government should take in dealing with this issue.

The prior administration decided that the Government should take an affirmative action approach. Accordingly, on May 18, 1979, the President issued Executive Order 12138, which established a national women's business enterprise policy. This order requires that Federal departments and agencies take affirmative action in support of women's business enterprise through management, financial, and procurement assistance programs. In addition, the order established an Interagency Committee on Women's Business Enterprise to help ensure that the order would be effectively executed. It also

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directed SBA to provide an executive director and staff support to help the Committee fulfill its responsibilities.

SBA also established a Women's Business Enterprise Division in March 1980. The Division was created to (1) give added visibility to SBA's efforts to promote women's business enterprise, (2) ensure that agency programs adequately consider the needs of women entrepreneurs, and (3) provide staff support to the Interagency Committee.

GAO limited its examination to the adequacy of management controls established by SBA and the Interagency Committee for promoting women business owners. GAO found that action should be taken in several areas to better ensure that SBA programs are meeting women's needs and that the Executive order is being effectively implemented.

SBA NEEDS TO REDIRECT
ITS EFFORTS TO ASSIST
WOMEN ENTREPRENEURS

SBA has emphasized new programs for women entrepreneurs without first determining the extent to which its existing programs are, or could be modified to be, responsive to their needs. This has contributed to several management problems which are discussed below.

GAO found the lack of operating procedures to be a major problem for the Women's Business Enterprise Division. For instance, although women's coordinators have been designated in each SBA region and district office to facilitate assistance to women, instructions have not been issued defining their responsibilities. Also, there is no clear line of authority between the coordinators and the Division, nor has any formal system been established for monitoring their activities. Moreover, procedures have not been established for coordinating the Division's activities with other SBA units. Without adequate procedures, the Division is limited in its ability to influence the delivery of SBA services to women.

Aside from the issue of procedures, a comprehensive evaluation has not been made to determine whether SBA's traditional programs are, or could be made, responsive to women's needs. SBA's Women's Business Enterprise Division has concentrated its attention on designing new programs for women because of its belief that existing programs have not met their needs. However, GAO found that this opinion is not shared by officials in SBA's financial and management assistance divisions. They contend that existing SBA programs are capable of providing effective assistance to women.

GAO questions the rationale of proposing new programs based on a belief that existing resources cannot meet women's needs. Furthermore, by adopting the strategy of developing new programs, the Women's Business Enterprise Division has become reliant on congressional approval of its budget request. However, the appropriations committees have taken the position that existing Federal programs should be used. Accordingly, they have been reluctant to approve funds for separate women's programs. Also, the new administration, in revising SBA's budget, has proposed further reductions in special business assistance programs for women.

GAO believes existing SBA programs need to be evaluated before any substantial funds are committed for special programs. This will provide information to better determine whether the new programs originally proposed were actually needed or whether their intended benefits could be achieved largely through existing agency resources. Aside from this evaluation, GAO also identified a need for better feedback from women receiving SBA assistance. Specifically, the data now being collected merely reflects the number of women who have obtained management or financial assistance. While this activity data is useful as a monitoring tool, it is inadequate for determining whether the assistance received is responsive to women's needs.

SIMILAR PROBLEMS
EXIST WITH THE
INTERAGENCY COMMITTEE

While the issues discussed above pertain to SBA, GAO also identified similar problems with the Interagency Committee. Specifically, the Committee has not given adequate attention to using existing Federal resources to meet women business owners' needs. A plan prepared by the Committee in November 1979 for promoting women entrepreneurs neither identifies nor discusses how existing Federal programs will be used to further this objective. Rather, the plan proposed that new programs be created specifically for women. The proposed programs have been the basis for the Women's Business Enterprise Division's budget requests.

GAO also found that the Interagency Committee has not provided adequate guidance to Federal agencies for implementing the Executive order. GAO believes this has contributed to the variations in agency commitment, which are discussed in chapter 3.

RECOMMENDATIONS TO
THE ADMINISTRATOR

The Administrator, SBA, should direct the Associate Administrator for the Women's Business Enterprise Division to

- evaluate whether existing SBA programs are, or can be made, responsive to women entrepreneurs' needs;
- determine what data should be collected to continually monitor the responsiveness of these programs and the best means for collecting this information;
- establish procedures governing the Division's operation and instructions specifying the responsibilities of women field coordinators; and
- provide the Interagency Committee with the staff support necessary to revise the interagency guidelines and to develop an improved reporting system to facilitate coordination of Federal agency activities.

The present administration's proposal to reduce expenditures for special programs for women was made in the belief that existing programs can essentially meet their needs. Implementation of GAO's recommendations should show whether existing programs are adequate or whether continued funding of special programs is warranted.

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	<u>ABBREVIATIONS</u>
GAO	General Accounting Office
SBA	Small Business Administration

CHAPTER 1

INTRODUCTION

The present Federal effort to bring women into the mainstream of business ownership developed in response to several events in the mid-1970s. Fundamentally, it has been a response to issues and problems raised by women business owners and women's organizations during congressional hearings or presented in several reports issued in the mid-1970s. For example, in May 1975 the U.S. Commission on Civil Rights issued a report entitled "Minorities and Women as Government Contractors" which points out that women have received a very small percentage of Government contracts. Shortly after this report was issued, two companion reports entitled "To Form a More Perfect Union" (1976) and "The Spirit of Houston" (1978) were released by the National Commission on the Observance of International Women's Year. These reports addressed the subject of women as business owners and also discussed a host of other issues and problems relating to women's rights. Aside from these reports, the House Subcommittee on Minority Enterprise and General Oversight, Committee on Small Business, held hearings in the spring of 1977, and more recently in September 1980, to identify specific problems faced by women in business and to receive suggestions for changes needed to address these problems.

Having reviewed these studies and also the testimony, we believe that many of the problems cited are characteristic of small businesses in general and are not unique to women entrepreneurs. For example, difficulties women experience in raising capital, or their lack of management and technical skills, are problems which confront many small business owners. Also, the fact that women have received a relatively small percentage of Federal contracts seems to be largely attributable to their concentration in the retail and service sectors. On the other hand, certain social prejudices directed at women, such as a credibility gap with contractors and bank loan officers, which have also been cited in studies and testimony, have undoubtedly intensified these problems for some women. However, since the extent and impact of these prejudices cannot be measured, it becomes a subjective decision as to what action the Government should take in fostering the growth and development of women-owned firms.

PRESIDENTIAL INITIATIVES TO ASSIST WOMEN ENTREPRENEURS

The former President made a campaign pledge to have a strong Federal policy to assist women entrepreneurs. This pledge was followed by several affirmative action initiatives, among which was the creation, in August 1977, of the Interagency Task Force on Women Business Owners. The task force was directed to analyze

obstacles impeding women from starting or developing their own businesses and to recommend ways to overcome these obstacles.

Report of interagency task force

On June 28, 1978, the task force issued a 221 page report to the President entitled "The Bottom Line: Unequal Enterprise in America." The task force findings were similar to those discussed in the prior studies and reinforced the testimony given before the House Subcommittee on Minority Enterprise and General Oversight. For example, the task force found an absence of clear or recent data on female entrepreneurship in America. Data that it assembled showed women businesses to be small, clustered in the retail and service sectors, and generally having few or no paid employees. Problems that the task force identified as impeding women from becoming entrepreneurs included sex stereotyping in education, lack of knowledge about capital markets, and lack of management and business skills.

The task force, however, went beyond the prior studies in commenting on the responsiveness of Federal programs to women. It found that while existing programs do not discriminate against women, women are seldom viewed as a separate market segment. The report pointed out that there is little information on either women's participation in Federal programs or assessments of the programs' relevance to women's needs.

Additionally, the task force found in its review of Federal loan and grant programs that

--federally guaranteed loans are usually unavailable for funding business startups and therefore cannot help significantly in meeting women's needs for startup money and

--while Federal grant programs offer potential for serving the needs of women business owners, the programs are often limited by both eligibility requirements and broad program aims.

In our judgment, these observations on Federal loan and grant programs are applicable to many small businesses rather than unique problems facing women entrepreneurs.

The task force report included a series of recommendations for Federal affirmative actions to promote women in business. Perhaps the most significant recommendation was that the President issue an Executive order to create a national women's business enterprise policy. Such an order was issued in May 1979.

Executive Order 12138

The order, issued May 18, 1979, established a national women's business enterprise policy that requires each Executive branch department and agency to facilitate, preserve, and strengthen women's business enterprise to ensure women's full participation in the free enterprise system. It requires each department and agency to take affirmative action in promoting women business owners by ensuring that Federal business-related programs are responsive to the needs of women entrepreneurs. In addition, the order states that affirmative action may also include the creation of new programs to address special needs of women.

To help ensure that the Executive order is carried out effectively, the President established the Interagency Committee on Women's Business Enterprise, which is made up of top-level officials from 16 Federal departments and agencies and the White House. The order required that the Committee design a comprehensive plan for a joint Federal and private sector effort to increase the numbers of new women-owned businesses and to promote larger and more successful women-owned businesses. On November 30, 1979, a plan for a "National Program for Women's Business Enterprise" was submitted to the President. Elements of this plan are discussed on pages 15 and 16 and in appendix I.

The order also requires the Interagency Committee to submit an annual report to the President citing actions taken by the Committee during the previous fiscal year and periodically make recommendations for legislation or other action to further promote the order's purpose. The first report was submitted in November 1980. (See p. 17.)

ORIGIN OF THE WOMEN'S BUSINESS ENTERPRISE DIVISION

SBA first focused on women entrepreneurs in late 1976 when a position called the Advocate for Women in Business and Consumer Affairs was established. During the first 9 months of 1977, the Advocate for Women in Business, in cooperation with SBA's Office of Management Assistance, designed a program of prebusiness workshops and seminars for women. This program was implemented in August 1977 through SBA's National Women's Business Ownership Campaign. In early 1978 the Women's Advocate position was re-organized and the Office of Women in Business created within the Bureau of Advocacy. During 1978 and 1979 this office continued the prebusiness workshops, initiated several new projects, and sponsored special news releases to acquaint women with SBA's services.

With the signing of Executive Order 12138, SEA was given added responsibility for promoting women in business. Specifically, SBA was directed to provide staff support to the

Interagency Committee to assist it in carrying out its duties. In accordance with this requirement, SBA provided the Committee with an executive director and several support staff.

In March 1980 the Office of Women in Business and the Executive Director and support staff of the Interagency Committee were merged into a newly created Women's Business Enterprise Division. The Division was created to give added visibility to SBA's effort to promote women's business enterprise and to strengthen working relationships with other operating programs within the agency. The Division is headed by an associate administrator and is organized into two primary offices--Special Training and Counseling and Community and Government Support. As of January 1981 the Division was authorized 22 positions; 15 were actually filled.

OBJECTIVES, SCOPE, AND METHODOLOGY

Our review objectives were to

- examine the justification for a Federal affirmative action policy for women business owners;
- identify actions taken by SBA, the Interagency Committee, and certain Federal departments and agencies to promote women in business; and
- determine whether improvements are needed to increase the responsiveness of Federal programs to women entrepreneurs.

Our review was primarily directed at determining whether management controls instituted by SBA and the Interagency Committee are adequate for developing a comprehensive and coordinated Federal approach to promoting women business owners. We did not attempt to make a broad-based examination of the effectiveness of Federal agency efforts to assist women entrepreneurs. Such an examination would have required a substantial commitment of our resources and would be more appropriate after other matters discussed in this report are resolved.

We reviewed various reports issued by different groups and organizations that have studied the problems and issues affecting women in order to examine the justification for a Federal affirmative action policy for women entrepreneurs. We also met with representatives of women's associations, including the executive director of the National Association of Women Business Owners. In addition, we reviewed material pertaining to congressional hearings on women in business.

We interviewed SBA headquarters officials responsible for the women's business development program in order to identify actions taken by SBA to promote women in business. These

included the Associate Administrator of the Women's Business Enterprise Division, office directors within this Division, and other staff personnel. We also interviewed senior officials in other SBA divisions to determine what actions they had taken to promote women entrepreneurs and how their respective programs were integrated with those of the Women's Business Enterprise Division.

We reviewed guidelines established by the Interagency Committee for promoting and coordinating Federal assistance to women entrepreneurs. We also reviewed procedures, brochures, and internal directives developed by SBA and 16 Federal departments and agencies. The data resulting from this analysis was used to determine whether there appears to be a comprehensive Federal response consistent with the intent of the Executive order to help women entrepreneurs. We did not attempt to use this data to evaluate the effectiveness of agency initiatives. The departments and agencies were generally selected because they were members of the Interagency Committee and because they administer programs which can benefit women business owners. Consequently, we consider them to be an excellent representation for the purposes of this review.

We supplemented our review of written procedures and guidelines with interviews at five of the departments and agencies. We spoke with those individuals responsible for overseeing actions taken by their agencies to promote women entrepreneurs. These included Directors from Offices of Small and Disadvantaged Business Utilization, and designated women's coordinators. Our purpose in meeting with these individuals was to obtain their perceptions on the adequacy of direction provided by the Interagency Committee and to confirm reported initiatives taken by their agencies to help women business owners.

We also performed work at SBA's Boston regional office and at one of the region's six district offices. This region was selected because the Boston area has one of the highest concentrations of women-owned businesses, and because we were advised that it was the only SBA region with a full-time women's coordinator. Aside from meetings with the regional and district directors and the women's coordinator, we also interviewed senior officials in the financial and management assistance areas. Our primary objectives in meeting with these officials were to obtain documentation on initiatives taken to promote women entrepreneurs, review the adequacy of SBA's management information system used to track assistance to women, and determine the degree of coordination between SBA and other Federal agencies within the region.

CHAPTER 2

FACTORS IMPEDING SBA'S EFFECTIVENESS

IN ASSISTING WOMEN ENTREPRENEURS

Several factors are hindering SBA's efforts to effectively respond to women entrepreneurs. However, most of them can be characterized as administrative problems which can be corrected. These problems include

- absence of clear line authority between the Women's Business Enterprise Division and women's coordinators in the field,
- lack of instructions specifying the field coordinators' responsibilities,
- overreliance on new programs to assist women entrepreneurs rather than on existing SBA programs, and
- lack of adequate feedback from women who receive SBA assistance.

In addition, the appropriations committees have been reluctant to approve funding for special women's projects. Instead the committees have encouraged the use of existing SBA resources to meet women's needs.

ORGANIZATIONAL LIMITATIONS OF THE WOMEN'S BUSINESS ENTERPRISE DIVISION

The March 1980 directive establishing the Women's Business Enterprise Division cites several broad functional responsibilities for the Division. These include:

- Developing plans, operating procedures, and standards to effectively strengthen and improve the agency's responsiveness to the needs of women entrepreneurs.
- Working with other SBA program areas to ensure that they consider women's business enterprise.

Our review has shown that coordination between the Women's Business Enterprise Division and other SBA operating divisions has been limited. We believe this is partly attributable to the fact that the Associate Administrator for Women's Business Enterprise was not appointed until June 1980, and the Division was not staffed to its desired level until October 1980. However, the absence of guidelines and lines of authority linking the Women's Division to other SBA units are more serious impediments to effective coordination.

SBA is essentially a decentralized organization with 10 regional and 66 district offices. While the Washington operating divisions set program policy and direction, SBA regional and district offices are generally responsible for administering these programs in their areas. We believe this organizational structure poses problems for the Women's Business Enterprise Division. Specifically, each region and district has designated a part-time women's coordinator. 1/ However, according to the Associate Administrator, these coordinators report directly to their respective home units rather than to the Women's Division. Also, the coordinators' function is considered a collateral responsibility and not included in their performance appraisals. The Associate Administrator said that while she believes SBA regions take the issue of promoting women entrepreneurs seriously, in her opinion, the level of commitment varies in the districts.

Aside from the issue of line authority between field coordinators and the Women's Business Enterprise Division, we also noted that guidelines had not been issued spelling out the coordinators' duties. The Associate Administrator said that she had prepared written position descriptions for the field coordinators but that they had not been approved by the SBA Administrator for reasons unknown to her. We believe this absence of guidelines or instructions for women's coordinators poses potential problems in coordinating the delivery of SBA programs and services. It also leaves a void concerning whether the coordinators have any responsibility for coordinating or monitoring actions taken by other Federal agencies to promote women entrepreneurs. In this regard, we found that while SBA's Boston regional office had participated in several seminars with other agencies, it had not attempted to coordinate or monitor overall Federal initiatives taken in the region to promote women business owners. The regional women's coordinator said that she did not perceive this to be her responsibility nor had she been directed by SBA's central office to perform this function.

In addition to the above problems, there is a need for better coordination between the Women's Business Enterprise Division and other SBA divisions. According to the Division's Associate Administrator and senior staff, they have spent most of their time conceptualizing alternative scenarios for delivering management and technical assistance to women, adapting these scenarios to budgetary changes, and preparing for testimony to justify the Division's existence. These individuals agreed that coordination with other SBA divisions could be improved. For example, no

1/ The Boston region is the one exception where a full-time coordinator has been designated.

operational manual or similar document has been prepared formalizing procedures for coordinating Division activities with other SBA units. Also, while the March 1980 directive states that the Women's Business Enterprise Division is to ensure that other SBA programs consider women's business enterprise, the Associate Administrator does not believe she has the authority to evaluate these programs.

As previously stated, the Division Director recognizes the need for improving coordination with other SBA divisions. Accordingly, a special assistant was hired in October 1980 to design a management model that is intended to provide a format for (1) improving the responsiveness of SBA programs to women's needs and (2) integrating innovative projects developed by the Women's Business Enterprise Division into existing SBA programs. As of February 1981 this model was still being designed; consequently, we had no basis to assess its potential utility in improving coordination with other SBA divisions.

SBA PROGRAMS HAVE NOT BEEN EVALUATED TO
DETERMINE THEIR RESPONSIVENESS TO WOMEN

SBA has published several pamphlets, directed specifically at women, describing the variety of services that the agency provides. These services fall into three general categories: financial assistance, management assistance, and procurement assistance. Financial assistance is provided through several loan programs, the largest being the 7(a) program. Management assistance is available through training courses, workshops, seminars, direct counseling, and various publications. Procurement assistance is provided principally by working with Government agencies to ensure that they set aside contracts for exclusive bidding by small business firms.

Since these services address the basic problems encountered by all small businesses, including those owned by women, we asked officials within the Women's Business Enterprise Division whether these services had ever been evaluated to determine whether they are effectively meeting the needs of women entrepreneurs. We were told that no comprehensive evaluation had ever been made to determine the responsiveness of SBA programs to women's needs. However, we were advised that the Division plans, in late fiscal year 1981, to have a consultant evaluate existing small business development programs, in the Government and private sector, to determine their sensitivity and responsiveness to the special needs of women business owners. Given the staff expertise within the Women's Division and other SBA divisions, we would expect that they would have considerable input in designing this evaluation.

While we agree that this evaluation should be performed, we question the rationale of proposing special projects and programs for women without having first assessed the capabilities

of existing programs to meet their needs. According to the Associate Administrator of the Women's Business Enterprise Division, special programs were proposed by the Interagency Committee in the 1979 Women's Business Development Plan (see pp. 15 and 16) because it was generally recognized that traditional SBA programs had not worked for women. The approach taken was to design separate programs that would work instead of analyzing existing programs to see whether they could be modified to meet the special needs of women.

We asked key SBA officials in the financial and management assistance divisions for their reaction to the approach taken by the Women's Business Enterprise Division. They commented that their divisions are capable of providing the kinds of assistance women need. Specifically, SBA's Director for Business Loans, Financial Assistance Division, told us that although SBA's loan programs have always been open to women, this message may not have been effectively communicated. In the opinion of the Director, the Women's Division was created to publicize and market existing SBA programs so as to draw greater interest and participation from women. He cited the mini-loan program, instituted in fiscal year 1980, as an example of a marketing strategy for helping women obtain 7(a) loans for \$20,000 or less. However, the Director pointed out that, with the exception of this program, evaluations have not been made of other SBA financial assistance programs to determine their responsiveness to women entrepreneurs. Consequently, he questioned the Division's approach, which emphasizes the creation of new programs, because it does not consider how existing programs could be used to promote women in business.

The Deputy Associate Administrator for Management Assistance told us that coordination between the Women's Business Enterprise Division and his division has been limited because the Women's Division has focused its attention on innovative projects rather than on the wide range of management and financial services already being provided by SBA. While he believes an advocate for women business owners is needed to ensure that SBA programs are responsive to women, he also questioned the need for the innovative projects proposed.

By adopting the strategy of developing new projects to meet women's needs rather than working through existing SBA programs, the Women's Division has become reliant on congressional approval of the Division's budget requests. However, because of the budgetary problems discussed on pages 12 and 13, very few innovative projects have been funded. Projects proposed in the 1979 plan and those actually funded by SBA are summarized in appendix I.

DATA INADEQUACIES

SBA collects data on the number of women participating in its financial and management assistance programs. While useful as a monitoring tool, this activity data does not provide management with the kind of information necessary to evaluate how responsive these programs are in meeting the needs of women entrepreneurs or whether women face unique problems warranting changes to these programs.

In the financial assistance area, for example, SBA established a goal of \$50 million in direct 7(a) loans to women in fiscal year 1980. A certain percentage of this goal was assigned to each SBA district with the requirement that it prepare monthly reports showing actual loan activity. These reports are sent to the Financial Assistance Division and to the Women's Business Enterprise Division where they are used to alert management of discrepancies between target goals and actual performance. When goals are not attained, inquiries are made to determine the reasons for the variations and suggestions are made for increasing loan activity.

While the activity data is useful, it is not being complemented with information as to why applications for financial assistance are being declined, nor are statistics on delinquencies and defaults of women who received loans being evaluated. Seemingly, this additional information should be collected and analyzed to identify specific problems and/or needs of women entrepreneurs and to determine whether special women's programs are needed or whether existing SBA programs are, or could be modified to be, responsive to their needs.

The Director, Office of Business Loans, agreed that this additional information could help identify specific needs of women and that the Women's Business Enterprise Division had expressed an interest in obtaining it. However, regarding loan approvals, he pointed out that a variety of factors, such as repayment ability, management expertise, and product marketability, are considered before a decision is made. Consequently, any data collection instrument that might be used to obtain this additional information would have to be carefully designed to provide meaningful feedback. Neither the Women's Business Enterprise Division nor the Office of Business Loans had initiated action to address this issue as of February 1981.

Likewise, in its management assistance programs, SBA has established goals for participation by women and has developed a monitoring system similar to that used for financial assistance. Once again, however, the data being collected merely reflects the number of women participating in the counseling or training programs. Also, management assistance recipients are generally not required to provide feedback on the adequacy

of the assistance received. It is this type of feedback that would be helpful to SBA management in making its assistance programs more responsive to participant needs, including those of women.

In addition to the lack of participant feedback, the accuracy of the data reported on women receiving management assistance is questionable. According to the Deputy Associate Administrator for Management Assistance, SBA has no procedures for verifying the accuracy of training and counseling reports prepared by district offices. In large training sessions, for example, the SBA facilitator will often report the number of women participants based on visual observation. Although the Deputy Associate Administrator presumes the reports to be about 90 percent accurate, roster sheets with names, addresses, and other demographics are not maintained as a matter of course.

Problems pertaining to data collection were also discussed in a December 31, 1980, report prepared by SBA's Office of the Inspector General. This report dealt with SBA's management training programs and pointed out that:

1. Documented evaluations of the quality and effectiveness of management and training activities were not prepared and agency criteria did not require them to be prepared.
2. Under current agency criteria, reporting the numbers and characteristics of attendees at management training activities results in unreliable and unsupported statistics.

The Associate Administrator for Management Assistance agreed with the report's findings and agreed to develop two new forms--an Attendee Evaluation Sheet and a Registration Form. On January 28, 1981, we met with the Deputy Associate Administrator for Management Assistance and his staff to discuss actions taken to correct the problems cited in the Inspector General's report. We were told that some preliminary work had been done on developing a registration form but no action had been taken with regard to designing an attendee evaluation form. He said that efforts to resolve the problems identified in the report are complicated by outside factors such as (1) the Paperwork Commission, which attempts to eliminate or consolidate forms rather than create new ones, (2) the Office of Management and Budget, which takes upwards of 6 months to approve a form, and (3) the Freedom of Information Act, which prohibits SBA from requiring its clients to provide certain demographic information.

BUDGET UNCERTAINTY

Projects contained in the November 1979 women's business development plan, and those presently being conceptualized by staff in the Women's Business Enterprise Division, remain

proposals rather than realities due to a lack of funding. Funds were not directly appropriated to the Division in fiscal year 1980, and budgetary complications have delayed the implementation of these projects in fiscal year 1981. The budgetary problems are briefly described below.

In January 1980 SBA requested a reprogramming of its fiscal year 1980 appropriations to implement projects proposed in the November 1979 plan. This request was declined by the appropriations committees. About the same time SBA also submitted its proposed fiscal year 1981 budget earmarking \$13.6 million for the Women's Business Enterprise Division. Although the House Appropriations Committee did not specifically address the \$13.6 million request, the Senate Appropriations Committee, in September 1980, proposed that it be reduced to \$5.6 million and suggested that \$5 million go to existing SBA management, training, and procurement programs. The remaining \$600,000 was to be used to maintain the staff positions in the Women's Division to help the SBA Administrator develop policies and coordinate agency programs to meet women entrepreneurs' needs.

The intent of this action, as set forth in Senate Committee Report 96-949, dated September 16, 1980, was that these funds be used by the other SBA divisions to meet the needs of women entrepreneurs. Specifically, the report states that

"While women entrepreneurs may face unique problems, the Committee does not believe that creation of separate large scale women's programs which parallel many existing agency programs is the proper way to proceed. The Committee concurs that more must be done to insure that SBA's programs are responsive to the needs of women entrepreneurs but believes assistance to women can best be delivered through the existing program structures."

On November 20, 1980, a conference committee met to discuss SBA's budget. Like the Senate committee, the conference committee was of the opinion that assistance to women could best be delivered through existing SBA programs. Although the conference committee report does not specifically mention the Women's Business Enterprise Division or its proposed projects, it clearly implies that the committee intended that certain funds originally budgeted for this Division be mainstreamed into other SBA programs.

In January 1981 we discussed the status of the Women's Division budget with the controller of SEA's Planning and Financial Management Division. He said that SBA's fiscal year 1981 appropriation provides the SEA Administrator with certain discretion over the actual allocation of funds between the Women's Business Enterprise Division and other SBA divisions. At that time, SEA's intention was to allocate about \$4 million directly to the Women's

Division in fiscal year 1981 and \$1.3 million to other SBA divisions to assist women entrepreneurs.

The change in administration, however, resulted in another revision to the Women's Business Enterprise Division's fiscal year 1981 budget. Specifically, the revised budget now proposes to allocate only about \$1.7 million directly to the Division while still allocating about \$1.3 million to other divisions. The \$1.7 million is to be used to fund special programs for women, at a reduced level, and to pay for the salaries and expenses of Division staff. This reduction in funding reflects the administration's intent to rely primarily on existing agency programs to meet women's needs. In this regard, the budget states that the Women's Division will be responsible for monitoring and promoting the effectiveness of existing SBA programs to ensure that they address the specific needs of women entrepreneurs.

According to the Division's Associate Administrator, \$140,000 of the \$1.3 million earmarked for other SBA divisions is to be used to fund the evaluation of existing business assistance programs cited on page 8. This evaluation should be helpful to the Women's Division in carrying out its responsibility of ensuring that these programs effectively address the needs of women business owners.

CONCLUSIONS

SBA programs that benefit existing or potential business owners should be responsive to those women seeking assistance. If these programs are not meeting their needs, deficiencies must be identified and actions taken to try to correct them. However, because of the emphasis given to innovative programs, insufficient attention has been given to existing agency programs to determine whether they are, or can be modified to be, responsive to women business owners.

This lack of attention to existing programs, coupled with uncertainty over organizational lines of authority, has contributed to several management problems impeding the operations of the Women's Division. These problems include

- the absence of instructions or procedures defining the responsibilities of women's field coordinators;
- the lack of a formal reporting system to facilitate the Division's monitoring of field coordinator activities;
- the lack of adequate procedures governing the Division's operation, particularly in regard to its interaction with other SBA units;

- the need for a comprehensive evaluation of SBA programs to assess their responsiveness to women entrepreneurs; and
- inadequate feedback from women participating in SBA's financial and management assistance programs.

RECOMMENDATIONS TO THE
SBA ADMINISTRATOR

In order to determine whether SBA programs are, or can be modified to be, responsive to the needs of women entrepreneurs, we recommend that the Administrator, SBA, direct the Associate Administrator for the Women's Business Enterprise Division to:

- Evaluate whether existing SBA programs are, or can be made, responsive to women entrepreneurs.
- Determine, in conjunction with the above evaluation, data requirements necessary to continually monitor the responsiveness of SBA programs to the needs of women business owners. When this determination is made, reporting forms should be modified, to the extent possible, to satisfy these data requirements.
- Prepare position descriptions and/or guidelines describing the specific responsibilities of the women's field coordinators. These guidelines should address any responsibility for coordinating or monitoring other agencies' activities. Moreover, procedures should be prepared, and a reporting system developed, to monitor the field coordinators' activities.
- Establish procedures governing the Division's operation, including how it will interact with other SBA units.

In addition, the Administrator, SBA, should issue a directive specifying the line of authority between the Women's Business Enterprise Division and the women's field coordinators. This directive should also provide guidance to the Women's Division regarding interaction with other SBA program offices.

CHAPTER 3

GREATER ATTENTION SHOULD BE PAID TO THE ABILITY OF FEDERAL PROGRAMS TO MEET THE NEEDS OF WOMEN ENTREPRENEURS

Aside from SBA, not enough attention has been given to using other Federal resources to meet the needs of women entrepreneurs. A plan for promoting women business owners, prepared by the Interagency Committee on Women's Business Enterprise, neither identifies nor discusses how these resources will be used in the future. Also, the Interagency Committee has not provided adequate guidance to Federal agencies for implementing the Executive order. We believe this has contributed to variations in agency commitment. Accordingly, to better ensure that the Executive order's objectives are met, the Interagency Committee needs to strengthen its oversight responsibility.

FEDERAL RESOURCES NOT DISCUSSED IN INTERAGENCY COMMITTEE PLAN

The Executive order required that the Interagency Committee on Women's Business Enterprise design a comprehensive plan to (1) increase the number of new women-owned businesses and (2) promote larger and more successful women-owned businesses. The plan also required the establishment of goals against which progress could be measured at the end of 2 and 5 years.

On November 30, 1979, the Committee submitted a plan for a "National Program for Women's Business Enterprise" to the President. In our judgment, this plan is not comprehensive because it does not discuss how existing Federal programs and resources will be used to meet the needs of women business owners. Elements of the plan, and why we consider it to be deficient, are discussed below.

The plan has two stated goals, which are to

- develop effective business management skills in significant numbers of potentially successful women entrepreneurs and
- improve the business environment for women-owned businesses.

To achieve these goals, the plan proposed a series of innovative projects to be funded over at least a 6-year period at a total cost of about \$184 million. Aside from the specific projects, the plan also recommended that the support of outside organizations, such as the National Association of Manufacturers, the U.S. Chamber of Commerce, and the National Alliance of Business, be enlisted. To enlist the support of these organizations,

the Committee suggested that the President appoint a committee of business leaders to work with them in coordinating an effort to develop new and more successful women-owned firms.

Projects proposed in the plan for achieving the two goals of developing effective business management skills and improving the business environment for women-owned businesses are discussed in appendix I. However, the lack of funding cited on pages 12 and 13 has generally precluded their implementation as of March 1981. Also, the proposal that the President appoint a committee of business leaders to work with national associations in promoting women entrepreneurs has not been acted on.

While the Executive order does not define the term "comprehensive," in our opinion it connotes a thorough and systematic approach to addressing a specific issue or problem. In the case of the Executive order, the issue is the promotion and development of women-owned businesses. Because the Committee's plan deals only with new projects, and neither identifies nor discusses existing Federal programs and resources which can benefit women entrepreneurs, we do not consider it to be comprehensive. To put the plan's proposed projects in the proper context, we believe the Committee should have identified existing Federal programs and resources, established future goals and objectives for using them, and developed a process for monitoring and evaluating their responsiveness to the needs of women business owners. Had this been done, the plan would have provided insight regarding the programs' ability to meet the needs of women entrepreneurs, clarified why the innovative projects proposed were necessary, and established a basis for the Committee to carry out its broader responsibilities, which are described below.

LIMITED DIRECTION PROVIDED TO FEDERAL AGENCIES

As stated earlier, Executive Order 12138 requires each Federal department and agency to take affirmative action to support women's business enterprise in appropriate programs and activities, such as management and technical assistance, financial assistance, education, and procurement. To help ensure that this action is taken, the order directs that the Interagency Committee

- establish policies, procedures and guidelines governing the implementation, interpretation, and application of the order and
- promote, coordinate, and monitor the plans and activities of the Federal departments and agencies in implementing the order.

On January 21, 1980, the Interagency Committee issued guidelines to Federal departments and agencies for implementing the Executive order. Although these guidelines adequately interpret

the order's intent, they do not provide specific direction for its implementation. For example, the guidelines state that

"* * * each Federal agency should examine its programs and those of its recipients of financial assistance and identify business-related activities and should then determine, in light of its statutory authority, what types of affirmative action in support of women's business enterprise would be appropriate."

In essence, the guidelines leave it up to each agency to do more or less as it sees fit with regard to promoting women entrepreneurs.

We asked the Acting Executive Director of the Interagency Committee why the guidelines were not more explicit in terms of providing both specific direction to agencies and in establishing minimal performance and reporting standards. We were told there were two reasons for the approach taken. First, the Executive order was issued shortly after Public Law 95-507, which mandated that agencies take specific affirmative actions to promote minority entrepreneurs. Since the agencies were in the process of gearing up their activities to comply with this mandate, the Interagency Committee decided that it would be preferable to take a "low keyed" approach regarding women in business to minimize the possible alienation of agencies and the fragmentation of resources. Secondly, the Committee recognized that it had no authority to punish an agency that chose to disregard the order. Accordingly, the guidelines were intentionally flexible in the hope that agencies would voluntarily take appropriate affirmative action. Unfortunately, the lack of more definitive guidelines, in our judgment, has contributed to variations in Federal agency commitment to the order. These variations are discussed below.

FEDERAL AGENCY COMMITMENT TO THE EXECUTIVE ORDER VARIES

Pursuant to section 501 of the Executive order, the Interagency Committee submitted its first annual report to the President in November 1980. The report traces the early work of the Committee and summarizes the efforts made by SBA and many of the Federal departments and agencies represented on the Interagency Committee in addressing problems of women business owners. The Federal departments and agencies submitted their comments on actions taken to comply with the Executive order in response to an August 1, 1980, letter from the Associate Administrator of the Women's Business Enterprise Division.

We reviewed the written responses as well as the annual report, which incorporates many of these responses. In addition, we met with officials from five departments and agencies; all five responded to the August letter.

We found that most agencies reportedly placed the greatest emphasis on increasing procurement opportunities from women-owned firms. However, the specific procurement-related initiatives varied considerably among the agencies, as the following table illustrates.

<u>Procurement initiatives taken</u>	<u>Number of agencies (note a)</u>
Established specific goals and monitoring system	15
Issued agency directives/regulations to increase purchases from women-owned firms	12
Emphasized placing women-owned businesses on bidders mailing lists	8
Compiled and distributed listings of women-owned firms	6
Conducted training sessions for procurement officers on contracting with women	4
Established rules for grantee procurement from women	3
Established a special achievement award for employees who enhance contract opportunities for women	1

a/Based on a universe of 17 agencies.

We also documented some variation in agency activities to promote women entrepreneurs through existing financial assistance policies and programs.

We advised the Associate Administrator of the Women's Business Enterprise Division that, based on our limited work, there seemed to be variations in agency commitment to the women's program. We asked whether this was a fair assessment. We were told that although some variation is due to differences in agency missions, our assessment was essentially accurate.

CONCLUSIONS

The Interagency Committee needs to revise its guidelines to provide more explicit direction to Federal agencies for implementing the Executive order. Specifically, the guidelines need to include definitive procedures for identifying existing programs and resources that can benefit women business owners. They should also provide appropriate direction to agencies for setting goals and objectives for using their resources in developing women entrepreneurs. Finally, the Committee needs to establish a

reporting system to monitor agencies' progress in meeting established goals and objectives.

By taking the above steps, the Interagency Committee will be in a better position to fulfill its responsibility for coordinating and monitoring Federal agencies' plans and activities in implementing the order. They will also be able to more adequately apprise agencies of what others are doing, thereby increasing the possibility of expanding positive initiatives.

RECOMMENDATION TO THE
SBA ADMINISTRATOR

To facilitate the implementation of the Executive order, we recommend that the Administrator, SBA, direct the Associate Administrator for the Women's Business Enterprise Division to provide the Interagency Committee, with the staff support necessary to revise the interagency guidelines and to develop a more structured reporting system for monitoring and coordinating agency activities.

INNOVATIVE PROJECTS PROPOSED FOR WOMEN

As discussed on page 15, the Interagency Committee plan established the following goals for promoting women entrepreneurs:

1. The development of effective business management skills in significant numbers of potentially successful women entrepreneurs.
2. The improvement of the business environment for women-owned businesses.

Projects proposed in the plan for achieving these two goals are discussed below. Although budgetary problems have generally precluded the implementation of these projects, those cited on page 25 have been initiated.

DEVELOPING EFFECTIVE
MANAGEMENT SKILLS IN WOMEN

To develop management skills in women the plan proposed the following projects and activities at a projected cost of \$12.3 million in fiscal year 1981.

<u>Project/activity</u>	<u>FY 1981 budget</u>
	(000 omitted)
1. Business development centers	\$ 4,500
2. Financial access projects	1,500
3. Call contracting	3,000
4. Corporate assistance	No cost
5. Instructional material	2,000
6. Procurement assistance	500
7. Research and evaluation	500
8. Federal agency support	No cost
9. Small Business Development Centers	<u>300</u>
Total	<u>\$12,300</u>

Business development centers

The largest portion of resources would have been allocated for the phased establishment of professionally staffed business development centers capable of delivering a combination of training, counseling, and support services to both new and established women entrepreneurs who have the potential for business success. Emphasis on these centers is based largely on the experience of the American Women's Economic Development Corporation, a model development center in New York City that was first funded by the

Economic Development Administration (EDA) in 1977 and that has been supported in subsequent years by contracts from both EDA and SBA. The plan proposed funding five new centers in fiscal year 1980 in major cities with a high density of women business owners. During fiscal year 1981 an additional 10 centers were to have been funded.

Financial access projects

These projects were to have been established in at least 12 cities where there were no women's business development centers. The projects were intended to help women analyze their businesses in financial terms, and obtain capital and credit. In choosing the locations, the interest of local financial institutions in cooperating with such projects would be a principal concern.

The Women's Business Enterprise Division has identified 10 tentative locations where it would like to initiate the projects. Initial startup costs are estimated at \$100,000 per location.

Call contracting

Section 7(j) of the Small Business Act authorizes SBA to contract with consultants for purposes of providing management and technical assistance to certain groups of small businesses. The plan proposed that an additional \$3 million be appropriated for this activity in fiscal year 1981 solely for the purpose of assisting women entrepreneurs. The call contracting services were intended as an alternative approach to the women's business development center concept. By having both types of services operating simultaneously, it was envisioned that an objective basis would be established for evaluating the efficiency and cost effectiveness of the center concept.

Corporate assistance

The plan calls for large corporations to provide management and technical assistance to women-owned businesses. Management and technical assistance would be provided both directly to individual businesses by corporations or indirectly through corporate support of women's business development centers. Such assistance could involve establishing relationships such as "adopt a business" efforts in which a corporation guides a small business, with which it has a working relationship, into an expanded role which enlarges the business and its profitability. A Presidentially appointed committee was to have directed this effort; however, as mentioned on page 16, it was never established.

Instructional material

Innovative teaching materials and courses were proposed to reach women business owners who are located more than 2 hours away from cities with centers or financial access projects. In reaching these women, extensive use of broadcast media was planned. Outside contractors would develop all materials and would also market and distribute them.

Procurement assistance

Special workshops to teach women business owners how to sell to the Federal Government were to have been developed and presented by independent contractors with the cooperation of Federal officials in all regions of the country on a regular basis each year. These workshops were to have varied from 1-day sessions to 5-day courses covering bid preparation, unsolicited proposals, contract negotiations, payment and cash flow problems of small businesses, and peculiarities of different buying agencies.

Research and evaluation

The plan's intent was to use each pilot project/activity to test hypotheses about the most effective methods of delivering management and technical assistance to women entrepreneurs. The projects therefore were to be designed to produce relevant data that would be regularly monitored and evaluated. Non-Government evaluators and program designers were to be used under contract to assist in this effort.

Federal agency support

The plan states that Federal agencies' affirmative action efforts to provide management and technical assistance to women entrepreneurs as mandated by Executive Order 12138 are to be promoted, coordinated, and monitored by the Interagency Committee and the staff provided to it by SBA's Women's Division. Efforts were to be made to focus such Federal programs on women entrepreneurs with the greatest potential for growth. These Federal programs include both general and specialized forms of assistance.

Small Business Development Centers

The plan proposed funding three projects at existing Small Business Development Centers to explore ways of improving the centers' responsiveness to women entrepreneurs. Also, the Associate Administrator of the Women's Division said that SBA's Management and Technical Assistance Division was considering a 7-month experiment at four Small Business Development Centers to see if they can be more responsive to women. However, the administration has proposed eliminating Federal funding of these centers.

IMPROVING THE ENVIRONMENT FOR
WOMEN'S BUSINESS ENTERPRISE

The plan's second goal was to improve the business environment for women-owned businesses. To accomplish this, the plan proposed funding four activities at a projected cost of \$3.5 million in fiscal year 1981. In addition, the plan proposed that a portion of SBA's direct loan funds be targeted for women and that the Interagency Committee on Women's Business Enterprise ensure that Federal efforts in the area of general business assistance serve the interests of women entrepreneurs.

<u>Project/activity</u>	<u>FY 1981 budget</u>
	(000 omitted)
Bettering public understanding	\$2,000
Improving financial community responsiveness	250
Improving access to business resources	750
Increasing use of the Procurement Automated Sources System (PASS)	<u>500</u>
Total	<u>\$3,500</u>

Bettering public understanding

The plan proposed the funding of a national campaign to educate the public on the economic importance of women entrepreneurs. This educational process was to be carried out through the use of printed and audiovisual materials distributed through all appropriate mechanisms--especially the broadcast media.

Improving financial community
responsiveness

The plan cites five separate actions for improving financial community responsiveness to women entrepreneurs. First, it proposed funding modular seminar materials to be developed by the National Association of Bank Women (NABW). These materials were to be designed to educate bankers about the women's market for credit and to educate prospective women credit applicants about banking practices and attitudes. This project was initiated in September 1980 with a \$36,000 grant from SBA. (See p. 25.)

Second, an outreach effort to national and State banking associations, the venture capital industry, and corporate sources of investment funds was to be initiated to promote greater interest in serving women. Third, Federal efforts were to have

been expanded to strengthen women-owned banks. Fourth, efforts were to be made to promote investments in women-owned firms by small business investment companies. Fifth, new forms of Government-backed venture capital companies were going to be designed to service smaller and slower growing firms than are currently being served by existing venture capital institutions.

Improving access to business resources

In order to improve women's access to business resources and opportunities, the plan proposed (1) promoting and funding trade organizations in a few selected industries to do special outreach to women, (2) expanding and strengthening women's business organizations, (3) mobilizing a leadership effort by prominent business leaders working through major business organizations to increase procurement by big business from women-owned firms, (4) establishing on an experimental basis a clearinghouse/resource center for information about public and private resources for women business owners, (5) promoting, coordinating, and monitoring of Federal agencies' outreach and information efforts in the business assistance area, and (6) handling of individual business problems of women entrepreneurs that have developed in relation to Government programs by a small staff of SBA caseworkers.

Increasing use of the Procurement Automated Source System (PASS)

PASS, which has been operational within SBA since October 1978, provides Federal procurement officers and prime contractors with access to information on the capabilities of over 42,000 small businesses as of April 1981. To increase this accessibility, the plan proposed that 50 additional terminals be funded in both fiscal years 1980 and 1981. Because of the system's wide usage, it was perceived as one of the best means for women-owned businesses to increase their participation in Government contracting. SBA has increased the number of terminals, although not to the level proposed in the plan. However, we noted that SBA had fallen far short of its goal to add 15,000 women-owned businesses in the PASS data base by the end of fiscal year 1980. According to SBA records, as of March 30, 1981, only about 5,300 women-owned firms were participating in PASS.

PROJECTS ACTUALLY FUNDED BY SEA

Given the impact of funding constraints on the 1979 plan, we asked the Women's Business Enterprise Division to provide us with a listing of all projects that SEA funded from fiscal year 1977 through December 1980 to assist women in business. The list contained two projects described below.

The first project involves the American Women's Economic Development Corporation (AWED) of New York City. This corporation initially received a contract from EDA in fiscal year 1976 and in subsequent years has received contracts both from EDA and SBA.

Since its inception in 1976, AWED has provided counseling services to thousands of women (reportedly about 7,500 in 1980) and long-term training to about 500 others. Testimony by individuals familiar with AWED's counseling and training programs and our discussions with staff of the Women's Business Enterprise Division indicate a high degree of receptivity both to the assistance provided by AWED and the methods employed in delivering this assistance.

AWED has been evaluated by SBA's Office of Inspector General and by a private consultant under contract with EDA. The SBA evaluations were essentially financially oriented and pointed out several problems with recordkeeping.

The consultant evaluation on the other hand was essentially directed toward assessing the effectiveness of the counseling and training provided by AWED to women entrepreneurs. The study was generally supportive of the AWED program, and by using economic indicators such as growth in employment and sales, it illustrated how women had benefited from the program.

The second project involves a \$36,000 grant with the National Association of Bank Women which was awarded in September 1980. Under the grant, NABW is to develop teaching modules, for use in its member chapters, to educate women in how to be successful in obtaining business credit from private banks. In addition, member chapters are expected to offer courses to banking colleagues to help them understand the special nature and problems of women's business enterprise and to learn to overcome attitudinal prejudices that impede women's access to commercial credit. The Women's Business Enterprise Division hopes to be able to provide NABW with \$75,000 in additional support to continue the project in fiscal year 1981.

According to officials in the Women's Business Enterprise Division, the teaching modules are to be pretested at two sites in calendar year 1981. Because the project is still in the development stages, it is too early to assess results.

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