

**Ohio**

**Small Business  
Development Centers**

A stylized American flag with a circular stamp overlay. The flag features a blue field with white stars and red and white stripes. The stamp is white with a red border and contains the text "NOW OPEN" at the top and bottom, and "OPEN FOR BUSINESS" in the center.

**NOW OPEN**  
**OPEN FOR BUSINESS**  
**NOW OPEN**

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TO: Team SBDC  
FROM: James A. Laipply, Director  
RE: Ohio SBDC Operations Guide



**James A. Laipply**  
Director, Ohio SBDC Program

The purpose of this SBDC Operations Guide is to promote the consistent application and implementation of the policies and procedures governing the Ohio SBDC program. The Guide clarifies our purpose, identifies our deliverables, and defines our responsibilities. It helps local SBDC center staff understand the SBDC program, expectations, and individual responsibilities in both managing administrative tasks and counseling clients. The guidelines aid in providing consistency and compatibility in terms of services and operating issues from center to center.

Admittedly, compliance can be challenging; however, the regulatory drivers of compliance should not impede us from seeking and pursuing strategic operational opportunities (or more simply put, the “how” of compliance), such as:

- An aligned operating strategy,
- Effective oversight mechanisms,
- Resource and personnel optimization,
- Streamlined business processes, and
- Quality data and information.

Unquestioningly, the law and its regulations form the foundation upon which our program exists. Like any foundation or backbone, the law and its regulations form a secure and firm base that adds stability to the structure as a whole. By concentrating solely on compliance and focusing primarily on immediate “fixes,” however, we unwittingly hinder ourselves from fulfilling our principle strategic priority—providing quality customer service—the heart of what we do! Instead, we should strive to integrate compliance and strategic operational opportunities that result not only in strong compliance processes, but tangible business results that fulfill our strategic goals of:

- enriched quality services,
- strengthened workforce,
- enhanced visibility, and
- maximized economic impact.

Consequently, we encourage both directors and their staff members to not merely follow these guidelines, but to also understand that regulatory compliance can actually embolden them to think innovatively and creatively in developing results-oriented, best practices. While fulfilling the *letter* of the law, such resourcefulness can effectively, efficiently, and expertly foster the *spirit* of the law by pioneering new ways to help small businesses succeed and grow Ohio’s economy.

## 2. HISTORY

### 2.1 NATIONAL PROGRAM HISTORY

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- 1976** The SBA implements a new University Business Development Center (IBDC) Program by funding a pilot initiative at California State Polytechnic University.
- 1977** Seven more universities are added to the network (University of Georgia, California State University, the University of Southern Maine, the University of Missouri, the University of Nebraska, Rutgers University and the University of West Florida). SBA introduces the Small Business Development Center Act.
- 1979** The network grows to 16 participants. The Association of Small Business Development Centers (now known as America's SBDC) is formed.
- 1980** President Carter signs legislation enacting the Small Business Development Center network into law.
- 1983-1984** Peer reviews are initiated and become the forerunner of the modern-day SBDC accreditation program, which is provided for by statute.
- 1990** For the first time, an SBDC is established in every state.
- 2003** There are now 63 programs in every state and territory including Guam, American Samoa, D.C., Puerto Rico, and the Virgin Islands.

Congress established the SBDC program to provide quality, in-depth, no-cost counseling and no- to low-cost training assistance to small businesses in order to promote growth, expansion, innovation, increased productivity, and improvement management. The SBDC program has grown dramatically since 1976 from the initial eight centers with a budget of \$350,000 to 63 SBDCs and an annual budget of approximately \$117,000,000. The rapid expansion of the national program is mirrored by huge increases in the programs and services offered by the SBDCs and by substantial impact on a large and rapidly growing small business client base.

### 2.2 OHIO SBDC HISTORY

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- 1985** Ohio establishes its own SBDC program hosted by the Ohio Department of Development (now the Ohio Development Services Agency).
- 1987** Ohio SBDC participated in and received its first national certification.
- 1995** Ohio Certified Business Analyst (now the Certified Business Advisor® program) is introduced.
- 2015** Ohio SBDC celebrates its 30<sup>th</sup> anniversary. Has built a network of over 50 partners.
- 2017** Ohio SBDC at Butler County wins the *national* SBA 2017 Small Business Center of the Year Award for Innovation and Excellence.
- 2019**
- Ohio SBDC at YSU wins the *national* SBA 2019 Small Business Center of the Year Award for Innovation and Excellence.
  - Ohio SBDC client, EarthQuaker Devices, wins the *national* SBA 2019 Exporter of the Year Award.
- 2020** Ohio SBDC celebrates its 35<sup>th</sup> anniversary!

### 3. THE OHIO SBDC TODAY

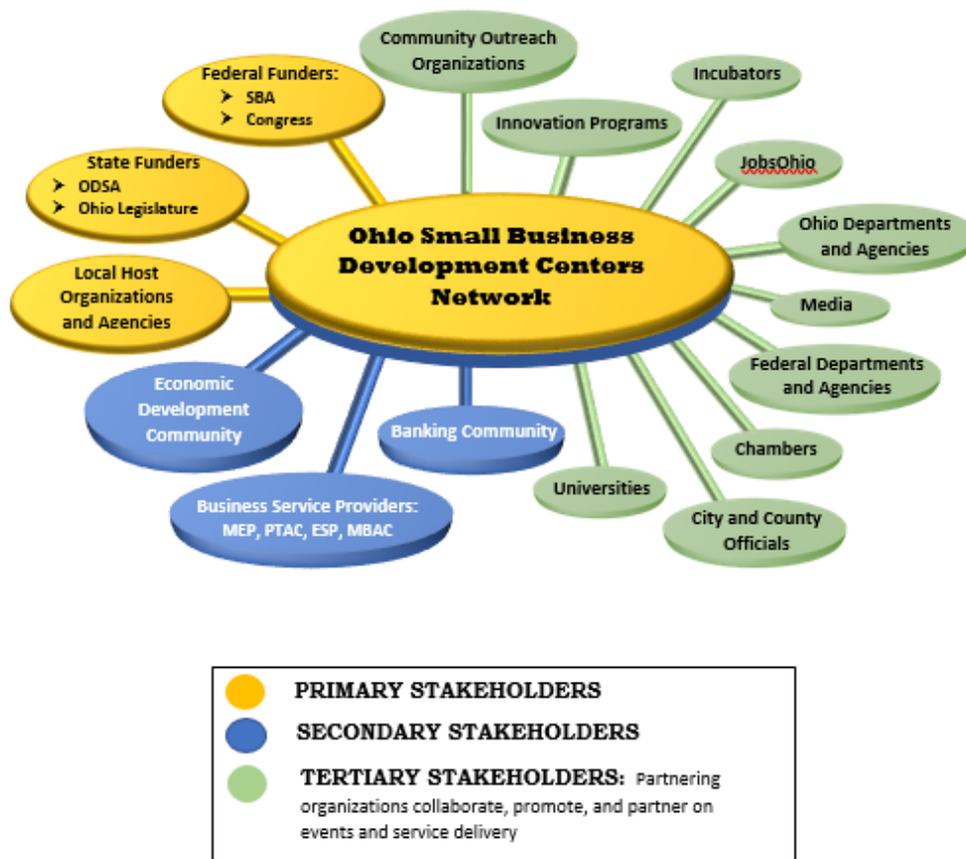
#### 3.1 STRUCTURE: PARTNERSHIP MODEL

The federal/state relationship is negotiated through the Cooperative Agreement between the SBA and the Ohio Development Services Agency (ODSA). Once this Agreement is executed, ODSA (through the SBDC) negotiates and selects community-based organizations to establish local centers which provide one-on-one business counseling, training, and specialized support to the small business community. This statewide program is referred to as the **Ohio SBDC Program**.

Local sponsors play a critical role in the success of an SBDC. Either through a Request for Proposal (RFP) process or Application for Continuation of Funding (ACF), ODSA formalizes its partnership with local host organizations into a proposal for the delivery of services during a designated federal fiscal year.

Although the service and/or center should be configured according to the requirements of this manual, our national and state governmental funding partners, and the ASBDC, the SBDC also encourages flexibility and diversity by allowing various types of organizational sponsors that effectively meet the needs of their localities. Therefore, the SBDCs encompass many variations with a common mission.

#### OHIO SBDC STAKEHOLDER AND PARTNER WHEEL



It is the practice of the State Lead Office to typically conduct a competitive RFP process every three years provided. Operating budgets and work plans are negotiated annually. Should an organization within the service area of an operating SBDC ask to become a service delivery partner, it is the position of the State Lead Office that such sites must be negotiated with the pre-existing SBDC.

## 3.2 TYPES OF PARTNERS

### 3.2.1 *Funding Partners*

#### 3.2.1.1 **Federal Funding Partners**

Legally, the ODSA holds the contract (Cooperative Agreement) with the SBA to provide the services of the SBDC program throughout the state.

In addition to and aside from the Cooperative Agreement, the SBA will, on occasion, inform certain states of the availability of supplemental funds and the necessity to submit a proposal for a set amount of these funds. These funds will either be added to the base contract amount employed by the Proposal for Continuation or are one-time funds.

The State Lead Office will notify all centers when the opportunity for supplemental funding occurs and their eligibility to receive all or some of those funds. The State Lead Office may or may not request a formal proposal from eligible SBDCs. Centers will be required to submit adjusted budgets denoting additional matching funds for supplemental funding.

Before application for other federal grants for the SBDC, the SBDC Director shall prepare a letter requesting concurrence addressed to the State Director. The State Director, in turn, will forward the letter to the Associate Administrator for Small Business Development Centers, U.S. Small Business Administration, for approval.

#### 3.2.1.2 **State/Local Funding Partners**

SBA greatly encourages both lead and local centers to obtain contracts and grants from sources other than SBA. ASBDC accreditation standards state that a mature SBDC should be able to demonstrate a strategy for seeking supplemental funding and that those funds are consistent with the SBDC mission. Also, centers should ensure that personnel, funding and/or equipment contributions are made to the SBDC by the private sector. Suggested local partners include:

- (1) **Institutions of Higher Education:** Local centers are strongly encouraged to partner with at least one “higher education/post-secondary” education partner (e.g., two-year colleges, technical colleges, universities, etc.) Federal legislation mandates that a majority of a state’s delivery partners be located in “higher education” settings.
- (2) **Chambers and Economic Development Organizations (EDOs):** Given the very nature of the SBDC and its purpose, it is critical to build partnerships with chambers, EDOs, and other economic development agencies. Such partnerships augment SBDC services by exchanging information and providing business-critical solutions to the SBDC’s end customer that reflect industry expertise.

### 3.2.2 *Non-Funding Partners (Resource Relationships)*

The Ohio SBDC is open to opportunities to fill the unmet needs of the small business community. The policy of the SBDC, however, is “not to compete, but cooperate” whenever there is another organization or agency already providing such resources in a service area. These resources include:

SCORE	SBA Mentoring Program
PTAC	Procurement Technical Assistance Centers
MBAC	Minority Business Assistance Centers
MEP	Manufacturing Extension Partnership
ESP	Entrepreneurial Services Provider Program

Often there may be policies regulating our relationship with a resource. If you have any questions about a relationship with a resource, please contact the State Director.

## 4. GUIDING PRINCIPLES AND GOVERNING DOCUMENTS: WHAT THE OHIO SBDC STANDS FOR!

### 4.1. PROGRAM DESCRIPTION/PURPOSE

The Ohio SBDC statewide centers are staffed by Certified Business Advisors® (CBA®) who deliver professional, high-quality, no-cost business advising and no- to low-cost trainings to existing small businesses and pre-venture entrepreneurs. *NOTE:* The SBA definition of a small business is complex, based on sales, profits, type of business, and number of employees. For general purposes, the SBDC describes its client population as having **500 or few employees**.

SBDCs provide problem-solving assistance to help small businesses access capital, develop and exchange new technologies, and improve business planning, strategy, operations, financial management, personnel administration, marketing, export assistance, sales and other areas required for small business growth and expansion, management improvement, increased productivity and innovation. Local programming should be flexible and continuously evaluated to address specific needs of the small business communities they serve.

### 4.2 MISSION, VISION, VALUES, AND GOALS

The **MISSION** of the Ohio SBDC Program is to.....*Accelerate Business Success*

The **VISION** of the Ohio SBDC Program is.....*“to be THE resource for business expertise”*

Entrepreneurs choose to locate in Ohio because of the great quality of business life. Small businesses flourish long-term because they can easily access a coordinated network of alliances and resources. Public policy embraces entrepreneurship and encourages informed risk taking. Small business wealth creation strengthens local communities and fuels Ohio’s economy.

The Ohio SBDC takes pride in the quality of services it provides its clients. With a customer satisfaction ratings consistently in the 90s and Net Promoter Scores over 80%, its success rests on high performing advisors whose level of performance is driven by four core values that guide their behavior and actions. These values are:

- **ECONOMIC IMPACT**—*this is why we do what we do*
- **SERVICE**—*the spirit with which we work*
- **GUIDANCE**—*the nature of our efforts*
- **COLLABORATION**—*the openness we possess to multiple our efforts*

### 4.3 GOVERNING DOCUMENTS

The Ohio Development Services Agency (ODSA) is the grant recipient from the SBA. As such, ODSA must follow certain published regulations regarding the SBDC Program. These documents, as seen on the next two pages, along with this Operations Guide, create the rules and regulations by which all local centers must abide in order to meet the terms of their contract.

## KEY FEDERAL GOVERNING DOCUMENTS FOR THE SBDC

**NOTE:** The policies and procedures written or referred to in Federal law, circulars, and other important government documents **SUPERCEDE** all other prior verbal agreements, exceptions, rules and/or policies and procedures of the Ohio SBDC Network. In the case of conflicting or otherwise inconsistent policies, the Federal documents listed below are assigned a ranking order, with the highest being the Small Business Act, and the last being SBA Policy Notices.

In all cases of conflicting or inconsistent policies, the *FEDERAL documents take precedence over the State documents.*

### Authorizing Legislation: Small Business Act – Section 21

#### SBDC Program Regulations: 13 CFR 130

Regulations carry out the legislation's purpose by specifying operating requirements, services, program responsibilities and oversight of the SBDC program.

#### OMB Omni Circular: 2 CFR Part 200

OMB Circulars or Federal regulations in effect as of the beginning date of the budget period and as amended during the term of the cooperative agreement and standard provision B of the Notice of Award. The Federal Office of Management and Budget publishes circulars that apply to all organizations operating with Federal funds. The circulars applying to the SBDC program are: A-21, A-87, A-102, A-110, A-122. Additional information regarding the OMB governing documents can be found at: [www.whitehouse.gov/WH/EOP/omb](http://www.whitehouse.gov/WH/EOP/omb).

#### OSBDC Program Announcement

Each year, the SBA sends out a Program Announcement for the upcoming year to all current statewide sponsors of the SBDC program. The Program Announcement outlines all the policies and requirements that the state must propose to meet. The SBA District Project Officer may add requirements as deemed necessary and agreed upon by the District Director and the SBDC State Director.

#### Notice of Award: Cooperative Agreement

Notice of Award with any special conditions (award subject to the availability of funds); otherwise known as the Cooperative Agreement. Upon acceptance of the proposal or Statewide Plan, SBA sends out the Notice of Award or Cooperative Agreement.

#### SBA Policy Notices

SBA Administrative Guidelines, including SBA Memoranda, SBA Policy Notices, and SBA Standard Operating Procedures, in effect as of the beginning date of the budget period or that become effective during the term of the cooperative agreement.

# KEY STATE GOVERNING DOCUMENTS FOR THE SBDC

**NOTE:** The SBDC Program is a partnership between the SBA and a state-endorsed organization receiving Federal assistance for its operation. In Ohio, the State-endorsed organization or Host is the Ohio Development Services Agency (ODSA). These documents provide the rules and Guidelines for establishing both the program and its policies. The policies, in turn, constitute the plan of action or ways of administering the intent of these governing documents. The State documents listed below are also assigned a ranking order to be used in the case of conflicting or otherwise inconsistent policies. The order of precedence below shall prevail, with the ODSA Grant Agreement being the first and the Operations Guide being last.

## ODSA Grant Agreement

Upon being awarded a cooperative agreement from the SBA, the State Lead Center sends out a Grant Agreement to each SBDC host institution. The Grant Agreement is the contract between the ODSA, as represented by the State Lead Center, and the SBDC host institution to operate the local SBDC service center. The grant agreement contains certain regulations and directives to meet proposal objectives and comply with federal requirements.

## SBDC Request for Proposal (RFP)

The State Lead Center will issue either a Request for Proposal (RFP), which is based on the SBA's Program Announcement, to all prospective SBDC partners or hosts or an Application for Continued Funding (ACF). The RFP is a competitive process, open to new eligible hosts. The ACF is non-competitive and is closed to any new host or organization (unless the current host decides not to propose for the upcoming year). The most current is available in the eLibrary.

## SBDC Accreditation Requirements

The ASBDC Accreditation Requirements expand on several Federal regulations to set standards to ensure quality in SBDC organization, operations, and services. The standards are modeled after the Malcolm Baldrige Quality Standards. Peer review groups from other SBDC programs examine each SBDC program every five (5) years to measure the level at which these standards are met. ASBDC Accreditation plays a significant role in the continuation of funding of SBDCs. Any updates or changes in ASBDC Accreditation requirements will be reflected in this Operations Manual.

## Operations Guide

(including ASBDC  
Accreditation Standards)

The purpose of the Operations Guide is to help local SBDC center staff understand the SBDC program, expectations, and individual responsibilities in both managing and counseling at the local service center. These guidelines aid in providing consistency and compatibility in terms of services and operating issues across the statewide network. Portions of the Ohio SBDC Operations Guide will be updated as necessary. Updates will be made available in the eLibrary. SBDC Directors shall be responsible for ensuring that each staff member adequately reviews this guide, as well as subsequent updates.

## 4.4 OVERSIGHT REVIEWS

### 4.4.1 *ASBDC Accreditation / National Delivery System*

A policy adopted in 1995 by SBA and the ASBDC requires the ASBDC to regulate SBDCs to ensure a quality program nationwide. Consequently, through a contract from SBA, all SBDCs across the country **MUST become accredited in order to be eligible for continued SBA federal funding.**

ASBDC accreditation requirements expand on several federal regulations to set standards to ensure quality in SBDC organization, operations and services. The standards are modeled after the Malcolm Baldrige Quality standards. The reviews, themselves, are defined by the current policies and guidelines of the ASBDC, and consider previously defined Ohio SBDC plans and programs and any responses to prior audits, reviews, and/or related deficiencies

Currently, these peer review groups review each of their fellow SBDCs every five (5) years to measure the level at which these standards are met. These teams visit local centers, as well as review the functions of the state lead center.

The ASBDC also has an Advisory Board made up of business owners who represent the interests of the ASBDC Regions for which they serve. ASBDC accreditation standards and process details can be found in the eLibrary

### 4.4.2 *SBA Reviews*

The SBA Project Officer is the representative of the SBA District Office responsible for oversight of the statewide program. SBA requires the Project Officer to make periodic reviews of each center. A report is sent to the State Director with a request for response to any non-compliance areas. Local directors are requested to notify the State Director of such visits and give their comments and concerns.

SBA may also conduct investigations as it deems necessary to determine whether any person or entity has engaged in acts or practices constituting a violation of the SBDC Act, any rule, regulation or order issued under that Act, or any other applicable Federal law.

### 4.4.3 *Other Possible Reviews*

The Office of Inspector General-SBA will conduct federal audits, which include a review of state lead center activities, financial records, and local SBDC activities.

The SBA will, on notice to the State Director, make programmatic and financial review visits to the local centers to inspect records and client files and to analyze and assess SBDC activities.

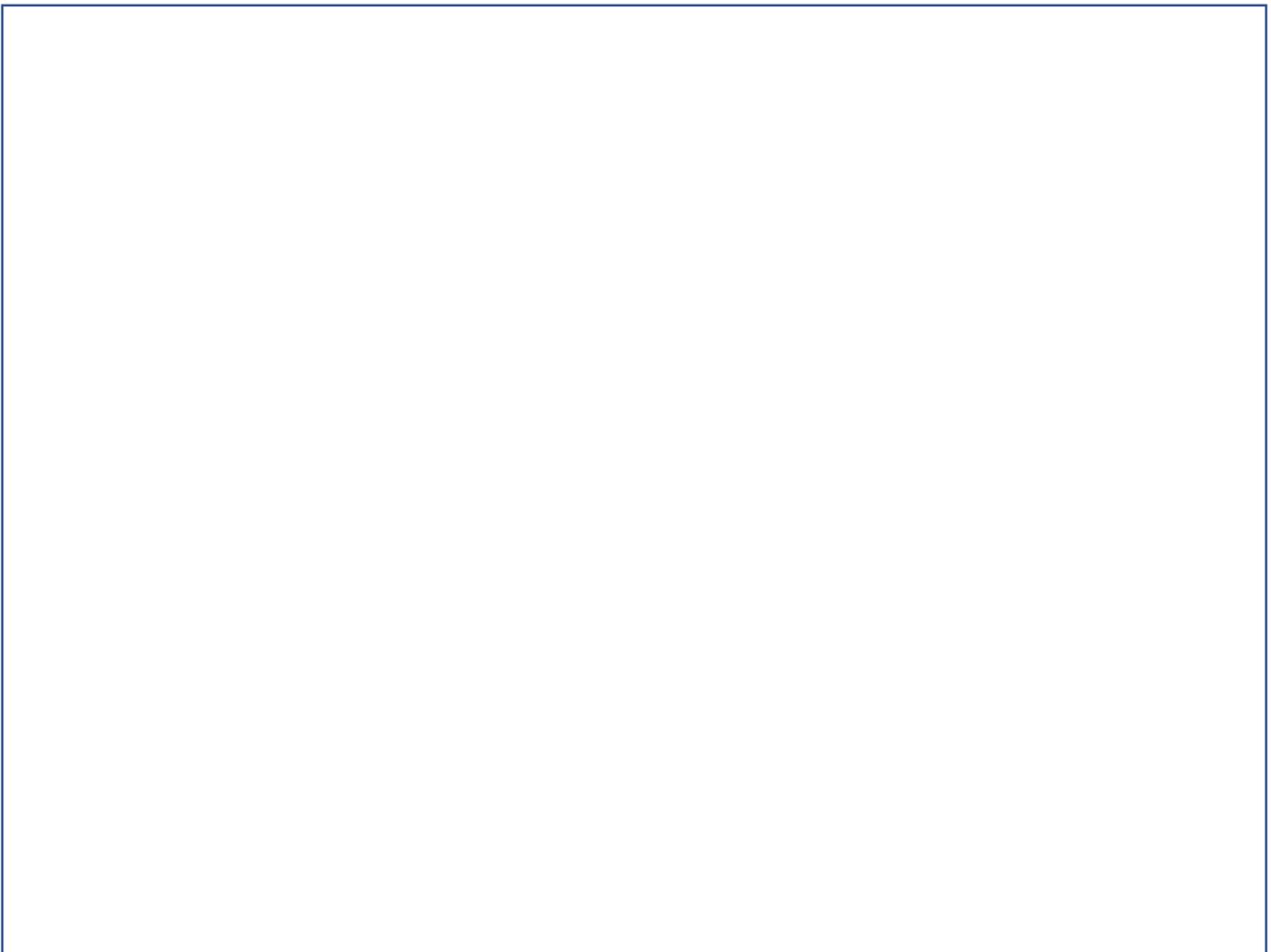
## 5. OPERATIONAL GUIDELINES FOR LEAD OFFICE / NETWORK

### 5.1 STRATEGIC PLAN

In addition to these guidelines carrying out the purpose and provisions of the Small Business Act, these guidelines are deeply rooted in the **Ohio SBDC's Strategic Plan**. The SBDC Strategic Plan lies at the heart of this organization's identity, purpose, and direction. Consequently, management places *great* emphasis on the SBDC's Strategic Plan, which infuses regulatory compliance in sculpting its delivery of high-quality, innovative customer service, while fulfilling its legal requirements.

To assist the network in understanding its role in executing the strategic plan--from its mission, vision, and values to its four pathways to quality customer service--centers and staff will be given the opportunity to boast their contributions in implementing the strategic plan during the Ohio SBDC's monthly director calls, annual on-site reviews (a.k.a. Center Assessment for Promoting Excellence or CAPE), and other selected venues, e.g., Annual Statewide Conference.

To keep the Ohio SBDC Strategic Plan top-of-mind, a copy of the plan is included below and on the following page:



## **5.2 LEGAL REQUIREMENTS**

The Code of Federal Regulations (13 CFR) Chapter 1, Small Business Administration, applies to all recipients and sub-recipients of SBA funding. SBA will conduct periodic compliance reviews to survey the practices of recipients. Written complaints will be investigated by SBA, and efforts will be made to resolve the matter through informal means. If it is determined that the matter cannot be resolved, action will be taken against the assistance programs. Copies of the CFR information relating to the following topics may be acquired from the state office.

Legal advisory information must not be provided to clients involved in litigation or other actions against the Government's interest. Legal information services must not be used to represent any clients in any action.

The SBDC may provide training regarding basic business law, but legal services and legal advice can only be provided by an SBDC counselor who is an active member in good standing of the State Bar Association in which the SBDC is located. SBDCs may negotiate arrangements with law schools to offer client access to supervised student legal clinics that are approved by the state attorney licensing entity. The SBDC must make appropriate disclosures and disclaimers to that effect.

### **5.2.1 Non-Discrimination**

All SBDC services must be rendered on a nondiscriminatory basis, and no individual may be excluded from any program because of race, color, religion, sex, age, disability or national origin. Workshops, seminars and conferences must be held in disabled accessible locations. Reasonable accommodations will be made, upon request, for visually and hearing-impaired attendees. SBDCs are required to make modifications and accommodations (which do not fundamentally alter the program or activity or entail financial or administrative burdens) to enable otherwise qualified disabled individuals to participate.

### **5.2.2 Drug-Free Workplace**

The Development Services Agency certifies that it provides, and will continue to provide, a drug-free workplace. Accordingly, local SBDCs must ensure that the host institution has notified its employees that as a condition of the grant, it is unlawful to manufacture, distribution, dispensing, possession or use of a controlled substance. If an employee is convicted of a criminal drug violation occurring in the workplace, the employee has up to five calendar days to notify the employer, in which time the employer must notify the state office. The State Lead Center will inform SBA project officer within 10 calendar days of occurrence and will discuss appropriate actions.

### **5.2.3 Sexual Harassment Policy**

It is the policy of the SBDC to maintain a working environment free from any discrimination, and to prohibit sexual harassment of applicants, customers, clients and agents, including discriminatory sexual advances or harassment adversely affecting an associate's terms and conditions of employment either directly or indirectly.

*Sexual harassment depends on how the person being harassed is affected, not on the harasser's intent, and will not be tolerated.* Any associate, customer, client or applicant who believes that an agent of the Ohio SBDC has caused them to be a victim of sexual harassment through unwelcome sexual advances, requests for sexual favors or any other verbal or physical conduct of a sexual nature should advise the perpetrator that the action is not welcome and must stop. The aggrieved individual may then report such incident(s) to:

- the employer of the agent;
- the Civil Rights Commission or
- the Federal Equal Employment Opportunity Commission.

A formal sexual harassment complaint may be filed with any or all of the following entities:

- the Ohio Civil Rights Commission within six months; and/or
- the federal Equal Employment Opportunity Commission within 300 days.

## 5.3 ETHICS

### 5.3.1 Conflict of Interest/Confidentiality Policy

All staff and associated personnel (meaning volunteers, consultants, students, etc.) for the program are expected to conduct themselves both at work and in the community in such a manner as to reflect creditably on themselves, their host institution, and the Ohio SBDC. Consequently, each counseling resource, including director, business advisor, consultant, faculty, student or volunteer and administrative support staff who work with clients and files (AA, coordinators, etc.), **are required** to annually sign the proper conflict of interest form, either 250 or 250-A. All signed forms are to be send to the State Lead Office where they are kept on file to ensure compliance and be readily available for review during program audits.

By signing this form, staff or associated personnel agree to abide by the terms enumerated on the 250/250-A forms, the Ohio Ethics Laws, and the Ohio SBDC Policy Statement on Client Privacy. Of the standards of conduct included, **the following five are of paramount importance being expressly prohibited by legislation and apply to all**, whether staff or associated personnel.



**(1) No information about any client's relationship with the SBDC** or any information about the business or personal matters of any client to any person or agency outside the SBDC Network is to be released without the written permission of the client. **All information provided by a client in the course of counseling is strictly confidential.** Only staff who have completed and signed a Conflict of Interest Agreement form may have access to that information.

**FOR MORE DETAILED INFORMATION, PLEASE READ SECTION 5.3.4. LIST OF CLIENT RIGHTS AND RESPONSIBILITIES AND TREATMENT OF CLIENT INFORMATION POLICY (PRIVACY REQUIREMENTS)** (13 C.F.R. PART 102, OSBDC PROGRAM ANNOUNCEMENT 4.1.5.1.)

- (2) No compensation** (whether monetary, gift, loan, promise of future employment, favor or service) is to be solicited or accepted from the client or third parties for SBDC consulting-related services or training;
- (3) No recommendation of goods or services** from a firm in which the staff or associated personnel have a material and/or financial interest;
- (4) No private gains** acquired from the staff's or associated personnel's SBDC position, including the private solicitation of his/her services as a private and independent vendor; "moonlighting" is permitted provided: (1) the outside activity does not interfere with the full performance of SBDC activities and responsibilities, and (2) no SBDC material, equipment or property is used for external consulting activities.
- (5) No advocating for SBA loans** or otherwise attempting in any manner to influence the SBA to provide financial assistance to any clients.

**NOTE:**

- Staff (SBDC employees) **not** affiliated with an educational institution may not teach during business hours.
- Any **external** activities, including teaching, must be pre-approved in writing by the SBDC State Director.

The above standards are not all-inclusive. Other guidelines are included in the forms and policies.

### **5.3.2 Restrictions on Lobbying**

In accordance with Federal *and* state regulations, the SBDC, through ODSA, certifies that no SBDC funds are used to pay any person for influencing or attempting to influence an officer or employee of any federal or state agency, a Member of Congress or General Assembly, an officer or employee of Congress or General Assembly, or an employee of a Member of Congress or General Assembly. All centers must abide by this restriction to avoid penalties for not complying with this requirement.

### **5.3.3 Penalties and Grievances**

Generally, penalties for violation of any of these policies may include, but not be limited to, reprimand, suspension of employment and/or termination from the Ohio SBDC Program and/or suspension or termination of employment. The local host and/or the State SBDC director shall make the determination as to whether a conflict of interest exists based upon this policy and applicable employer policies and state law.

### **5.3.4 List of Client Rights and Responsibilities**

A more detailed listing of SBDC client rights and responsibilities and the policy on client privacy are included in the next two pages. The State Lead Center encourages that these notices be displayed in the lobby or included on the back of SBA Form 641 or other document provided to the client. SBDCs, too, shall abide by the policies reflected in these statements.



As a new client of a Small Business Development Center (SBDC), which is a member of the Ohio SBDC Network, we'd like to advise you of certain rights and responsibilities you have as one of our clients.

You have a right to expect:

- *Prompt, courteous, and professional counseling services and to be advised if the OSBDC is unable to provide service within the period required. Be aware that due to the demand for our services, cases must often be prioritized by need and training may be recommended before counseling is provided.*
- *All information shared with the SBDC and any of its resources (staff, faculty, volunteers, and consultants) will be held in **strictest confidence**. No information provided by you will be used to the commercial or other advantage of any staff member, consultant, or other resource of the SBDC or to the advantage of any third party.*
- *That your client status with the SBDC will remain **confidential and is protected by federal law**. See Section 21(a) of the Small Business Act (15 U.S.C. 648(a)). **Your information cannot be disclosed without your consent, unless--***
  - (i) the Administrator [of the SBA] is ordered to make such a disclosure by a court in any civil or criminal enforcement action initiated by a Federal or State agency; or*
  - (ii) the Administrator considers such a disclosure to be necessary for the purpose of conducting a financial audit of a small business development center, but a disclosure under this clause shall be limited to the information necessary for such audit."*
- *Our role is to counsel and assist small business owners and those planning to go into business. We will not make business decisions or judgments for you, though we will make recommendations and suggestions as appropriate. These will be based upon our best efforts to apply the experience and resources then available to us to your case in order to assist you in making your own business decisions.*
- *The SBDC may charge reasonable fees for training programs, special services, and publications. Also, no recommendations will be made as to the purchase of goods or services from any individual or firm with which any SBDC staff or its resources have any financial, familial or personal interest.*
- *The counseling services, which are provided to you at no cost, are a part of the effort of the SBDC and its sponsors to respond to the growing needs of the small business community and to positively affect the economy of Ohio. They are not intended to compete with, replace, or be a substitute for services that are available from the private sector. Clients whose needs can be fully met by private sector practitioners or firms in an affordable manner will be encouraged to use those resources.*
- *In consideration of the SBDC furnishing you with management and technical assistance, you agree to waive all claims against the SBDC and its constituent institutions, its staff, or any other resources employed by or used concerning these services. You will also be expected to cooperate with the SBDC in its efforts to assure the quality and effectiveness of the counseling services, which it provides.*
- *In this respect, the SBDC will ask all clients who receive counseling assistance to complete a written evaluation of the services provided. In addition, all clients will be asked to complete a brief "impact" assessment within one-year following the close of the case file. Finally, clients may receive direct inquiries from this office, the state director's office or the U.S. Small Business Administration with respect to the services provided to you. Your response to all of these inquiries will be greatly appreciated.*
- *We welcome you as a client and encourage you to call on us if you have any questions or comments concerning your rights and responsibilities with respect to our services. You can do so by calling your local SBDC Director or the SBDC State Director at (614) 466-2711.*

## Treatment of Client Information (Privacy Requirements)

(13 C.F.R. Part 102, OSBDC Program Announcement 4.1.5.1.)

- Unless otherwise specified, all financial, statistical, personnel and/or technical information and data furnished, produced or otherwise made available to the SBDC by its small business customers during the performance of this Agreement shall not be used for purposes other than performance of work under this Agreement. ***The above information received by the SBDC may be privileged and must not be released or disclosed by the SBDC without the prior written consent of the client unless otherwise required by law.*** If such information is requested in a legal proceeding, the SBDC must take the necessary precautions and legal recourse to protect privileged information.
- 15 U.S.C. Sec. 648 (a)(7) provides that client information can only be made available to SBA for legal enforcement action and financial audits. However, SBA is also allowed access to client data for obtaining program activity information or conducting client surveys.
- No files or records will be removed from the premises of any government agency with which the recipient may work without the approval of the agency in possession of such documents. Publication of any information will be in accordance with 2 C.F.R.200.333-337.
- Except where a client consents in writing or as directed by SBA per the statute cited above, SBDCs are not permitted to disclose any client information to a third party (or share such information with other units of your organization not directly involved in the conduct of this project).
- This means that any mailings to clients must be done by the center for outside organizations, and only for purposes of needed information or supporting those small businesses - NOT for marketing or supporting one private enterprise over another. It is STRICTLY FORBIDDEN to give out or sell mailing lists with client names.
- In cases where a center or its staff is approached on a legal basis to provide information about a client and/or counseling relationship, centers should refuse to divulge such information citing confidentiality agreement with the client. If the client provides written permission to release such information, the center may do so. However, if not, the center should continue to refuse to provide such information until he/she receives a court order. At that time, the center should notify the State Director, follow the court order and provide the information. The staff member should respectfully note to the court that providing this information is a violation of their confidentiality agreement as the client has not given permission for the disclosure of the information, and that they are doing so only due to court order.

## 5.4 FEE REGULATIONS

- ***Federal regulations prohibit charging fees to clients for counseling services.*** However, centers may charge reasonable fees for services beyond the scope of normal counseling to recover the costs associated therein (see 5.3.1 and 5.3.2 below).
- If these event fees are paid directly to the SBDC, they are considered program income and shall be used to expand services and further SBDC program objectives. Centers must be prepared to provide justification for a fee to an auditor.
- For all co-sponsored training, where there will be a distribution of receipts in whole or in part to the co-sponsor, the training file for the activity must document clearly the role and responsibility of the SBDC and each participant receiving a share of the receipts. How the receipts were distributed must also be documented in the file.

**NOTE:** *SBDCs are reminded that income received by the local host institution for all co-sponsored programs cannot be used for match funding and should be used to further support the SBDC and reported as Program Income.*

### 5.4.1 ***Allowable fees for services include:***

- Seminars, workshops, and conferences, e.g., meal and refreshment expenses, workbooks, and other related costs;
- Purchase of prepared reports;
- Subscriptions to data or information services provided by the SBDC; examples might be procurement or international trade leads sent to clients on a regular basis;
- Products and services, if the product or service provided to a specific client requires that the SBDC expend funds in order to obtain the product or service to be utilized by the client. Then the direct non-personnel costs associated with acquiring that product or service may be passed through to the client.
- Specialized services or products not normally delivered as a core SBDC service, i.e., FisCal analysis, IQa, BizMiner, ProfitCents, in-depth international trade market research and other professional assessment products delivered to the client.

Each activity must be recorded on a Program Income Activity Report, and all fees and expenses must be itemized and provided a support to Program Income on the center's quarterly report.

### 5.4.2 ***Prohibited fees include:***

- No fees may be charged for client counseling.
- Fees cannot be used to offset local cash match.
- SBDC clients may not be solicited for any donations.
- SBDCs may not accept donations from SBDC clients or third parties.
- Fees cannot be used to pay for items in the budget.

## 5.5 BRANDING AND COMMUNICATIONS

All centers are required to follow the marketing and graphics guidelines established by the SBA and DSA:



### Ohio Small Business Development Centers (SBDC) Logo Requirements

**Key Guidelines:**

1. The SBDC logo must be prominently displayed and secondary SBA and ODSA logos must appear on all materials.
2. All program materials, regardless of center should, reflect a similar brand and look.
3. Materials must not promote a host organization over the SBDC program.
4. The following disclaimer is required:

"The Ohio Small Business Development Center (SBDC) program is funded in part through a cooperative agreement with the U.S. Small Business Administration. The SBDC program is also funded in part by the Ohio Development Services Agency. All services extended to the public on a non-discriminatory basis. Language assistance services are available for limited English proficient individuals. Reasonable accommodation for persons with disabilities will be made if requested at least two weeks in advance. Contact SBDC at [local phone number or (614) 466-2711] or visit our website: [www.sbdc.development.ohio.gov](http://www.sbdc.development.ohio.gov)."

### Ohio SBDC Logo Usage

The Ohio SBDC logo may be used in the two color variations provided (four-color and one-color). The one color black logo may be reversed to white when placed on a solid dark color.




The Ohio SBDC Export Assistance Network logo must appear prominently on all export related program materials. The Export Assistance Network logo is considered a primary logo along with the host logo. Additionally, the SBA and ODSA logos must appear as secondary logos on all export related program materials.

**Primary Logos**  
(prominent location on program materials)



**Secondary Logos**  
(secondary location on program materials)



**DO NOT alter the Ohio SBDC, SBA and ODSA logos.** The logos should be scaled and sized proportionally and must not be squeezed, stretched or rotated. Do not alter the color of the logos.







John R. Kasich, Governor      David Goodeman, Director



The Small Business Development Center Program of Ohio (SBDC) is funded in part through a cooperative agreement with the U.S. Small Business Administration. The SBDC program is also funded in part by the Ohio Department of Development. All opinions, conclusions or recommendations expressed are those of the author(s) and do not necessarily reflect the views of the SBA. Reasonable accommodations for persons with disabilities will be made if requested at least two weeks in advance. Contact SBDC (614) 466-2711 or at our website: [www.sbdc.development.ohio.gov](http://www.sbdc.development.ohio.gov).

The State of Ohio is an Equal Opportunity Employer and Provider of ADA Services

Revised 10/21/2016

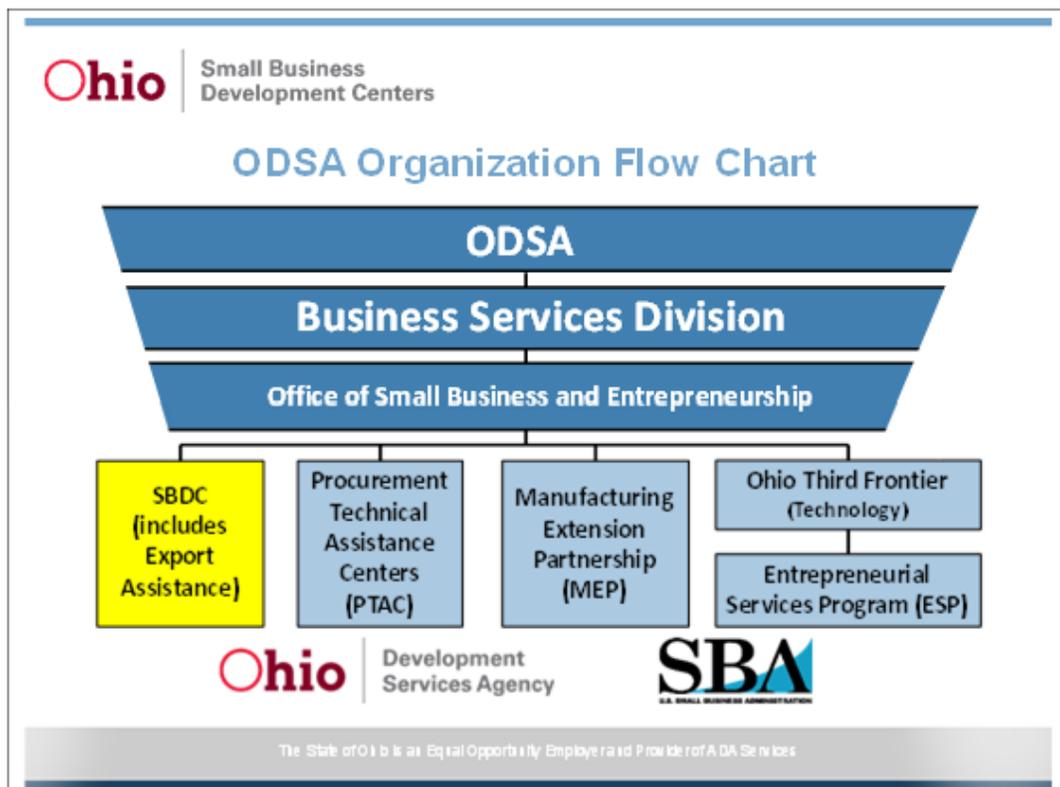
- All marketing materials must contain the identification of the SBDC in the following manner:
  - The Ohio SBDC at [insert name of location] Chamber of Commerce
  - The Ohio SBDC at [insert name of location] University
  - The Ohio SBDC at [insert name of location] Organization
- The Ohio SBDC program distinction must be prominent in all marketing materials.
- For further information, refer to the ***Ohio SBDC Branding and Communications Guide***.

## 6.0 STATE LEAD CENTER STRUCTURE AND RESPONSIBILITIES

(AS REQUIRED BY FEDERAL AND STATE REGULATIONS, SBA ANNUAL PROGRAM ANNOUNCEMENT, AND ASBDC ACCREDITATION STANDARDS)

### 6.1 STRUCTURE OF THE STATE LEAD CENTER (INCLUDING THE SBDC EXPORT ASSISTANCE NETWORK)

- The SBDC organizational structure must be consistent with the SBDC mission, goals and funding abilities. The SBDC should be capable of supporting the Strategic Plan, including ensuring that staff deployment is consistent.
- The SBDC must show that the host and its chief administrator understand and support the program, and that the program has become a component of the host's economic development effort.
- The SBDC must demonstrate that it has systems and a structure capable of overseeing and managing its budgets. Given appropriate administrative requirements, the State Director should be in control of the SBDC network's budget and able to assure that program generated income is used in support of the SBDC program.
- The SBDC should be a private/public partnership. Support for the SBDC should be demonstrated by the direct funding from the state legislature, the host agency, local centers, state agencies, foundation or units in the private sector.
- The State Lead Center must be an independent entity within the host organization. The SBDC must have a separate budget and identity and should not be an indistinguishable part of a larger unit.
- The SBDC State Lead Center is located within the Office of Small Business and Entrepreneurship at the ODSA.



- This arrangement prevents the position of State Director from becoming politically appointed, which is strictly forbidden by SBA guidelines, and ensures continuity in program administration.
- Also, as required by federal regulation, in our non-university setting, the State Director is accountable to an individual who is no lower than the third level of management or administration within a state agency (2017 Program Announcement 5.1.6).
- The State Lead Center must have (1) its own full-time staff, including a full-time Lead Center Director, (2) a separate budget and identity, and, (3) if part of a larger unit, must be a clearly distinguishable sub-unit (2017 Program Announcement 5.1.5).
- The State Lead Center should also demonstrate the availability of sufficient resources to manage the SBDC network.
- The State Lead Center must be accessible to the public and operate during the normal business hours of the host organization.
- SBDC program recipients are required to maintain a minimum number of counseling and training staff with expertise in export assistance.

## **6.2 RESPONSIBILITIES OF THE STATE LEAD CENTER AND DSA EXPORT ASSISTANCE OFFICE**

(OBLIGATIONS OF THE STATE LEAD CENTER AS REQUIRED BY THE FEDERAL AND STATE REGULATIONS, SBA ANNUAL PROGRAM ANNOUNCEMENT AND ASBDC ACCREDITATION STANDARDS)

### ***6.2.1 The Ohio SBDC State Lead Center Responsibilities***

The Ohio SBDC accomplishes the goals of its mission by serving as the focal point for the coordination of Federal, state, and private resources to aid small businesses.

The SBDC State Lead Center must provide for the overall management, oversight, administration, and coordination of the SBDC network and program. The schematic on the next page illustrates the role and responsibilities of the State Lead Center and how its responsibilities and the Ohio SBDC strategic plan are intricately interwoven and work hand-in-hand--with the strategic plan clarifying the Lead Center's responsibilities and the Lead Center's responsibilities implementing the strategic plan.



### ***6.2.2 DSA Export Assistance Office Responsibilities***

- Assists the SBDC Export Assistance Network by offering access to in-depth market research in 42 countries to help small businesses build local relationships.
- Also offers assistance by:
  - Locating qualified distributors and end-users to sell their products,
  - Providing international marketing grants to encourage more investment into international market development, and
  - Providing export-trained internships to support export growth.

**OHIO SBDC LEAD CENTER**  
Strategic Leadership of the Ohio SBDC Network

**ADMINISTRATION**

**COMPLIANCE**

Demonstrates sufficient authority, communication, and oversight over all SBDC centers as established by a Memorandum of Agreement (grant agreements).

Operates under a confidentiality and conflict of interest agreement.

Ensures the host understands and supports the program by integrating program in the institution's economic development effort.

Performs a Center Assessment to Promote Excellence financial and programmatic review at local centers. See [elibrary](#) for CAPE format.

Issues to be communicated to local director. Should problems persist, the State Director, local director and host will work together to resolve issue.

Accountable to state and Federal funders; submits reports to key stakeholders as required.

**STRUCTURE/SERVICE DELIVERY**

Ensure statewide coverage and maintenance of services while allowing for the mix of services and geographic coverage to meet the changing needs of the small business community.

The SBDC should be a private/public partnership.

**FUNDING**

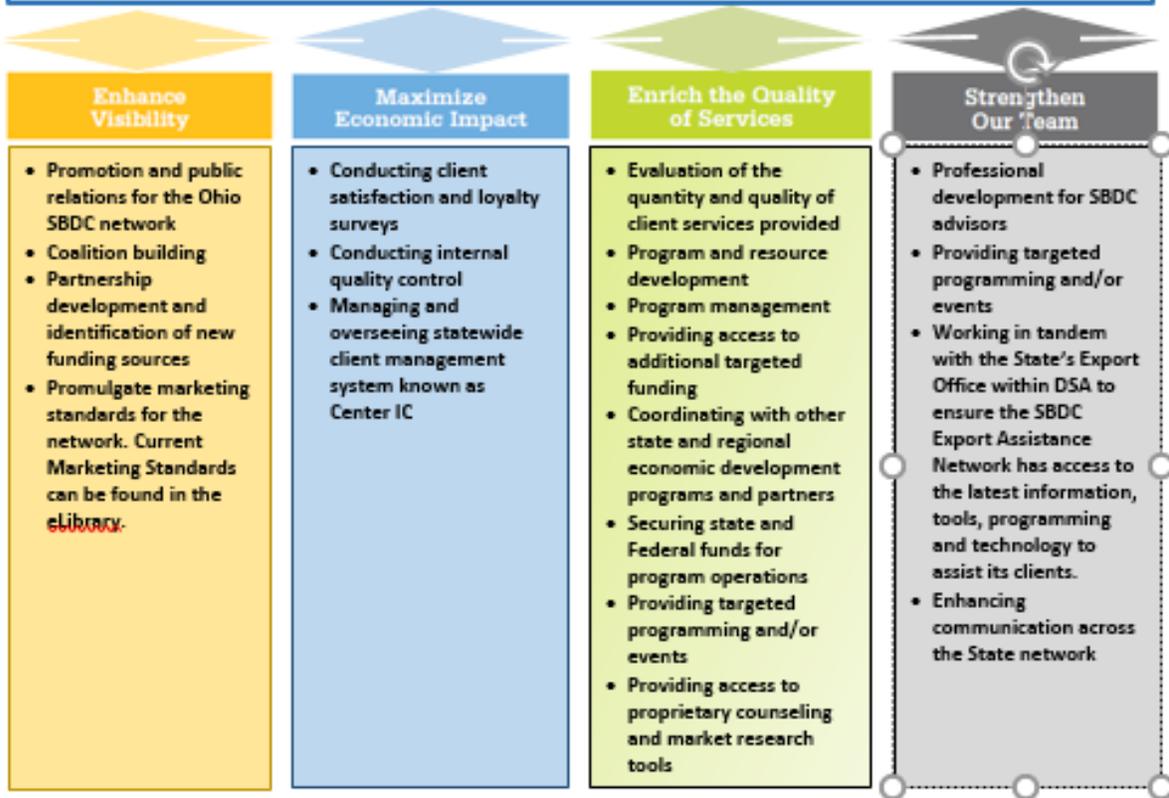
Financial accounting, invoice approval, grants management and oversight.

Document direct match funding from eligible sources into the program.

Support for the SBDC should be demonstrated by the direct funding from the Federal and state legislatures, the host agency, local centers, state agencies, foundations or entities in the private sector.

Demonstrate availability of sufficient resources to manage the SBDC network.

Funding the Ohio SBDC Export Assistance Network, a team who assists companies with accessing international markets and recruiting more companies to export.



## 6.3 STATE LEAD CENTER PERSONNEL AND RESPONSIBILITIES

### 6.3.1 State Director

Administrative	Advocate	Human Resources
<ul style="list-style-type: none"> <li>• Has authority, communication, and oversight over all program activities and financial affairs of the SBDC network to deliver effective services to the small business community, comply with applicable laws, regulations, and standards, as established by Memoranda of Agreement (in Ohio’s case, grant agreements).</li> <li>• Operates and administers the operations of the SBDC network and must have full authority to make expenditures under the Center’s budget, assure that program generated income is used in support of the SBDC program, as well as to manage the program activities (2017 Program Announcement 5.1.5).</li> <li>• Develops and provides specific information, reports and/or special services as requested or required by the SBA/SBDC Administrators, the SBA Business Development Specialist, and the Director of the SBDC.</li> <li>• Per Federal regulations, the state director may manage other programs in addition to the SBDC program if the programs serve small businesses and do not duplicate the services provided by the SBDC network. However, the state director may not receive additional compensation for managing these programs.</li> </ul>	<ul style="list-style-type: none"> <li>• Promotes the SBDC program and advocate for small business through presentations to communities and entities.</li> <li>• Develops relationships with key stakeholders including, but not limited to, SBA, Ohio Development Services Agency, banks, chambers of commerce, economic development organizations, trade groups, educational institutions, legislators, and hosts.</li> <li>• Develops appropriate advertising, promotion, and marketing materials.</li> <li>• He/she serves as the principal contact point for all matters involving the SBDC network and serves as the program’s representative to the ASBDC.</li> <li>• As the representative of the ODSA, the State Director works in a cooperative role to negotiate program issues with both the SBA and the local sponsors.</li> </ul>	<ul style="list-style-type: none"> <li>• Local center directors officially report directly to the State Director (or his/her designee) for programmatic purposes and, in his/her absence, to the Associate State Director.</li> <li>• As the direct supervisor of local centers, the State Director is ultimately responsible for the fulfillment of the contract with SBA, the local sponsors and the ODSA, and carries all authority inherent in such responsibility.</li> <li>• Supervise business advisors’ and support staff’s counseling, training, reporting activities.</li> <li>• Promotes staff development by utilizing continuing education opportunities to enhance professional development.</li> </ul>

### 6.3.2 Other Staff Members

Other state office management staffers operate in a support role to the local centers and report to the State Director. In Ohio, other staff members include an Associate Director, Fiscal Manager, two (2) program specialists, and a training and professional development specialist.

### 6.3.3 State Advisory Council

- By law, the Ohio SBDC is required to maintain a state advisory board. The purpose of the Ohio SBDC Advisory Council is to provide advice and counsel on issues pertaining to the SBDC program and small business, to provide technical advice or recommendations on services, evaluations, strategic directions, etc.
- A majority of the advisory board members must be representatives from small businesses or associations representing small businesses located throughout the entire area of service. Veterans, women, minorities, and Native Americans should be represented as appropriate. The SBA District Director should be a non-voting member.
- The Advisory Board will meet in person once annually at the SBDC Statewide Conference.

## **7. NETWORK / HOST STRUCTURE AND RESPONSIBILITIES**

### **7.1 DEFINITION: OHIO SBDC NETWORK OR OHIO SBDC PROGRAM**

- In addition to the SBA and DSA, the Ohio SBDC Program includes local participating organizations, referred to as “SBDC local service centers,” which receive funding through the SBDC State Lead Center to provide services to small businesses in their service area. Each year, the grant agreement establishes a “service area.” The combination of the Lead SBDC, SBDC local centers, and any satellite locations is referred to as the “Ohio SBDC Network” or “Ohio SBDC Program.”
- While it is recognized that each SBDC is a unique combination of resources, sponsors, and clients and therefore unique in its delivery of SBDC services, every local center must meet minimum standards designed to ensure quality service to the State’s business community.
- Each service center serves a distinct geographic area, except in cases where a client chooses to seek services outside of his/her service area or when client needs exceed local center competencies.
- All centers are required to operate within the guidelines of the mission of the network (see section 3). This includes all activities, other programs or grants operated under the Ohio SBDC organization or its auspices. If the applicability of any activity is in question, the center needs to contact the State Director for clarification.

### **7.2 STRUCTURE OF THE OHIO SBDC NETWORK**

#### **7.2.1 SBDC Statewide Centers**

- The federal eligibility requirements of a recipient organization (the state office) does not hold true for SBDC service providers (the local centers). With the concurrence of the state office, local centers can be hosted by nearly any non-profit organization or combination thereof, provided that the host demonstrates proof of adequate, secure and continuous funding and commitment to the growth and prosperity of the local SBDC.
- Local network centers operate so the SBDC is separate and identifiable from the host agency.
- The SBDC also takes into consideration its goal of statewide coverage, meaning that no business is more than an hour’s distance from assistance at an SBDC. An SBDC Network Map is viewable on the next page.
- All SBDC service delivery sites that do not have full-time 40-hours-per-week staff shall be designated as an “SBDC satellite” office.
- A Service Center may partner with a host location to establish regularly scheduled office hours by either by a full-time SBDC staff member or consultant (circuit rider) in return for office space and utility services provided on an in-kind basis, and/or cash contribution to the SBDC Service Center program.

## Small Business Development Centers (SBDC)

# Ohio



### 7.2.2 Local Center Advisory Boards

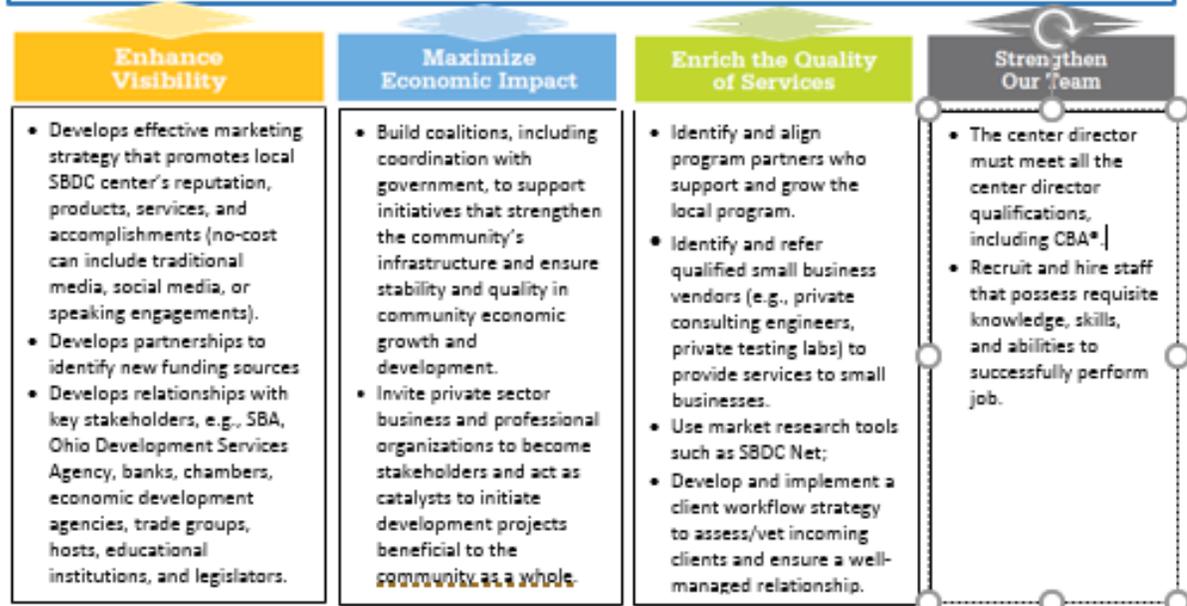
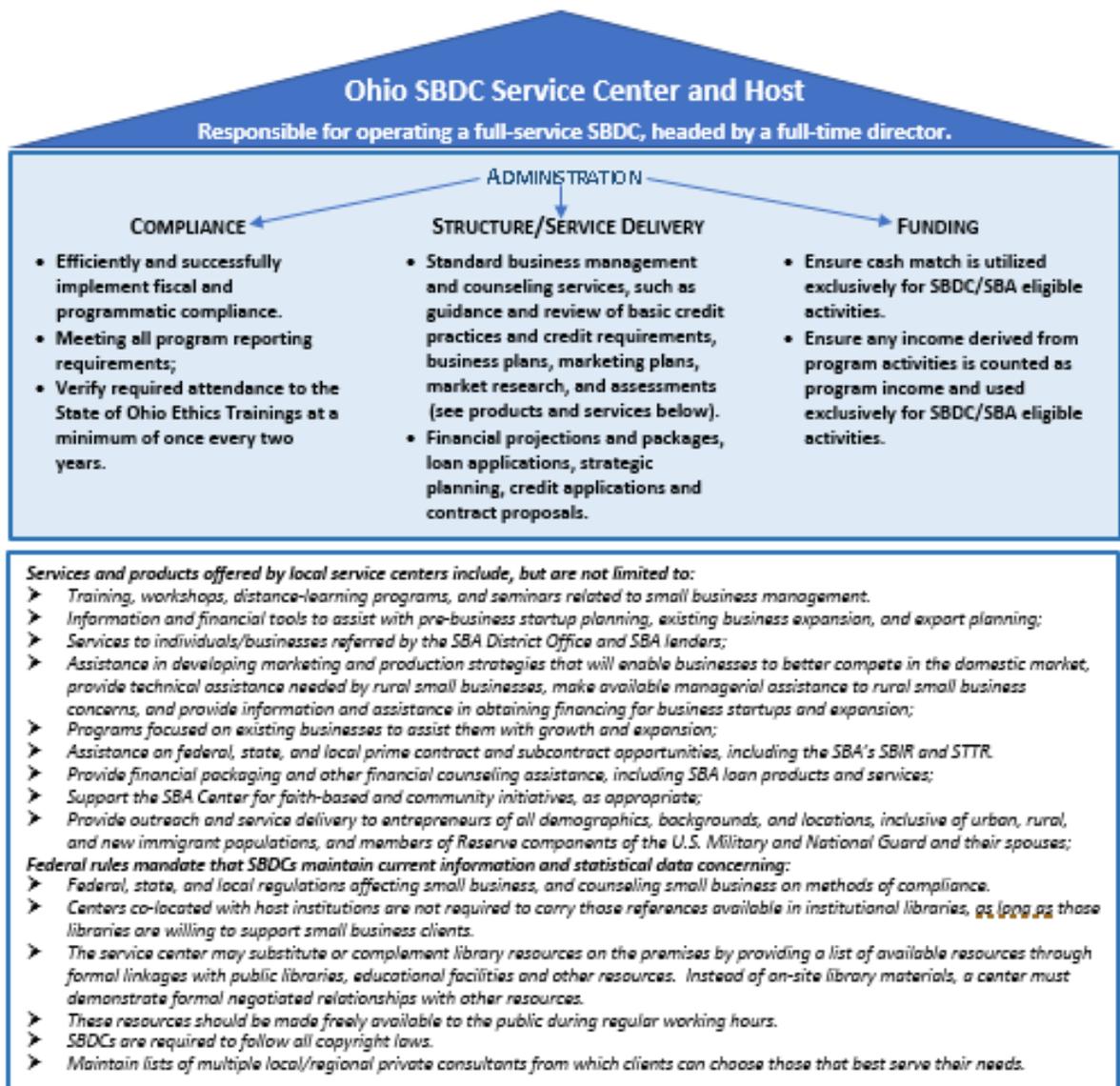
Local service centers are encouraged to have an advisory board comprised predominantly of small business owners and/or partnership organizations that contribute to the resource system.

The scope of involvement and frequency of advisory board meetings shall be determined by the local center. Local advisory boards shall be used to help assess SBDC client services, conduct local needs assessments, and assist in the development of local SBDC strategic planning initiatives.

Local advisory boards can also be used to establish visibility and support for the local SBDC system and include private sector fundraising, legislative awareness, staff recruitment, etc.

## 7.3 RESPONSIBILITIES OF THE SERVICE CENTER AND HOST

### 7.3.1 Service Center/Host Responsibilities include, but are not limited to:



### 7.3.2 Centers that offer SBDC Export Assistance shall provide:

- Client data as required on SBA Form 641 including numbers of small businesses new to export; numbers of new markets entered; export revenues; referrals to a USEAC or SBA; referrals to the Department of Commerce, Department of Agriculture, Department of State, Ex-Im Bank, OPIC or the USTDA; number of jobs created or retained in the exporting aspect of the businesses;
- Assistance to small businesses (in cooperation with the SBA's Office of International Trade, the Department of Commerce, other relevant federal agencies, and in alignment with State policies) to:
  - Identify and develop potential export markets;
  - Facilitate export transactions;
  - Obtain export financing;
  - Develop trade linkages between U.S. and foreign small business firms;
  - Participate in international trade shows;
  - Access export assistance in rural areas;
  - Develop or reorient marketing and production strategies for international markets;
  - Obtain referrals to appropriate resources for trade adjustment and trade remedy assistance;
  - Conduct Export Trade Assistance Partnership (E-TAP) programs;
  - Make translation services more readily available where possible to small firms doing business, or attempting to develop business, in foreign markets;
  - Establish hyperlinks between SBDCs, U.S. Export Assistance Centers, the Department of Commerce ([www.export.gov](http://www.export.gov)).
- Provide international business information and resource identification;
  - Conduct training, workshops and seminars on relevant international business topics;
  - Conduct a written client assessment and case management plan to include information gathering, problem solving, opportunity identification and planned course of action;
  - Provide standard product services, including but not limited to: export assessment, basic guides, trade leads, market research and international business plans.

## 7.4 SERVICE CENTER EMPLOYMENT STANDARDS AND RESPONSIBILITIES

### 7.4.1 Center Staffing Employment Standards

- SBDC shall be, as much as practicable, staffed by employees of the SBDC grantee or subcontractors of the grantee.
- The State Lead Center establishes minimum employment standards for Business Advisors and Center Directors and **MUST provide final approval of all SBDC center director hires.**
- The grantee, as employer, retains all other authority relating to SBDC staff recruitment, selection, direction, and retention.
- Each service center must be staffed by at least one full-time business advisor and center director.
- Each service center must also have administrative support for at least 10 hours per week.
- Full-time SBDC staff is greatly preferred over multiple part-time staff.
- A potential SBDC director or full-time business advisor **MUST** meet the State established minimum qualifications and **MUST agree to participate in the state-mandated Certified Business Advisor® (CBA®) process.**
- Graduate students shall appear on the Budget if they are paid employees.
- All graduate student teams with time devoted to counseling and research for SBDC clients may be entered into Center IC under a team log in and counted as SBDC counseling hours. Team activities are required to be documented on a log, supported, and reviewed by a CBA®.
- All counseling by *non*-CBA graduate students, volunteers, external consultants or SBDC business advisors not yet certified **MUST** be supervised and reviewed by a Certified Business Advisor®.
- The State Lead Center **MUST** receive **immediate** notification for all changes in personnel.

***Grant funding may be denied should the center host fail to meet these requirements.***

#### 7.4.2 Hiring

- A formal search process will be required for each professional position. The Ohio SBDC's formal hiring process is defined in detail in the Appendix.
- In order to ensure the highest level of service to our clients, each region and funded center therein is expected to adopt the minimum qualifications and position guidelines as provided by the State Lead Center.
- A potential SBDC business advisor or director must meet the State established minimum qualifications. (The minimum qualifications for the various positions are defined in the position descriptions provided in the Appendix.)
- All professional consulting staff will be qualified by reason of education and/or experience to provide high-quality services.
- Positions must be advertised and interviews must be handled in a fair and impartial manner. All positions will be filled on an Affirmative Action/Equal Opportunity basis. No center may discriminate in hiring or firing.
- Promotion from within is the exception; however, host institution policies take precedence in hiring processes.
- **All directors and business advisors MUST participate in counselor training and development programs when mandated by the State Lead Center. In addition, each center shall make every effort to budget for and participate in training and networking activities as provided by the America's Small Business Development Centers (ASBDC).**
- **All service center directors and full-time business advisors are required to take the Certified Business Advisor® course. (See 7.4.3. for more information).**
- All local SBDC center staff is subject to the hiring practices in place, which govern employment through their sponsoring organizations. **Final hiring decisions with respect to local SBDC directors, however, is the responsibility of the SBDC State Director, who MUST provide final approval of ALL SBDC Director hires.**
- Job descriptions must be maintained on file for all positions paid for with program funds (program funds include the entire funding in which the program operates). Personnel and hiring records must be maintained as well.
- All SBDC staff shall be paid commensurate with the skills and abilities required by the position descriptions. The State Lead Center okays the right to negotiate in salary-setting activities of host agencies if:
  - salary levels proposed and approved through the RFP process are not implemented;
  - salary levels are not in parity with local, state and/or national norms for same or similar SBDC positions (salary means, averages and distributions for position salaries are kept on file in the State Lead Center);
  - Centers will follow the policies of their host institution regarding vacation. Center directors are expected to use reasonable judgment when scheduling vacations and should avoid being absent for scheduled SBDC network meetings and periods when critical reports are due.
- The State Lead Center **MUST** receive notification for all changes in personnel.
- **Grant funding may be denied should the service center host fail to meet these requirements.**

## Why CBA is beneficial for SBDC professionals:

- provides assurance to clients and funding partners that all Business Advisors in the SBDC network have the business skills, competency and knowledge to effectively counsel, guide and inform entrepreneurs;
- serves as a review of knowledge obtained through education and experience. CBA is, in essence, a proficiency exam, and reaffirms the Business Advisor's knowledge in business basics;
- establishes a baseline for continuity and consistency in service delivery regardless of location;
- contains travel costs and reduces time away from the office;
- is designed to be applied immediately in the workplace. Students can integrate the material into their jobs while learning instead of waiting until the class ends. Work and learning become one and the same;
- answers the need for lifelong learning. CBA provides a framework for continuing professional development by requiring additional continuing education annually to maintain certification;
- meets the criteria for professional development certification training as required by the U.S. Small Business Administration (SBA) and the national America's Small Business Development Centers (ASBDC) association.

## Testimonials

"This program provides an in-depth study in the most important areas that a small business owner would face in running a business, such as marketing, accounting, finance, and human resources. Since completing this program, I have more knowledge and confidence to consult with my small business clients and would highly recommend this certification program to anyone who provides consulting services to small businesses."

LINDA A. STORTZ, CPA, MACC  
Certified Business Advisor®  
Advanced Certified QuickBooks ProAdvisor  
Seminole, Florida

"After I completed the marketing section of CBA, I consulted with a client who was struggling. I was now able to find that she was not even marketing to her target market.

Last week I was asked about a target salary range for a specific type of employee. I was able to refer the person to O\*Net Online, as suggested in the CBA® materials.

I worked with two different clients who were already in business--but struggling. Using the horizontal and vertical analysis of their recent financials, I showed them some of the negative trends that were creating fiscal issues for them."

STEPHEN A. HEIL  
Management Consultant  
University of Kentucky SBDC Elizabethtown



### 7.4.3 Certified Business Advisor® (CBA®) Professional Development Requirement

- The CBA® program is an eLearning certification program that certifies SBDC business advisors through graduate level, multimedia, online instruction in accounting/finance, marketing, and human resource management. Ohio CBA® candidates are given six (6) months to successfully complete the course by passing exams for each module and a final Integrated Case Study.
- The purpose of the CBA® Program is to provide assurance to our clients and funding partners that all business advisors, in the small business assistance network in Ohio, have the business skills, competency, and knowledge to effectively counsel, guide, and inform Ohio entrepreneurs.

In addition, the Ohio SBDC Certified Business Advisor® program:

- Reaffirms the Business Advisor's knowledge in business basics;
  - Establishes a baseline for continuity and consistency in service delivery regardless of location; and
  - Provides a framework for continuing professional development.
- All SBDC service center directors and full-time advisors **MUST** successfully complete CBA® within the first six (6) months of employment.
  - Counseling and training activities performed by an advisor or consultant not CBA® certified **MUST** have his/her client work supervised by a CBA® staff person.
  - All SBDC staff members are strongly encouraged to enroll in CBA®.
  - Once graduated, business advisors are required to retain their certification by acquiring 20 hours of continuing education per federal fiscal year.
  - For more details, see the CBA® Manual in the Appendix.

#### 7.4.4 Service Center Director Responsibilities

Administrative	Advocate	Human Resources
<ul style="list-style-type: none"> <li>• Officially reports directly to the State Director (or his/her designee) for programmatic purposes and, in his/her absence, to the Associate State Director.</li> <li>• Assumes ultimate responsibility for the service center's compliance including, but not limited to, success stories, milestone tracking, and other requirements.</li> <li>• Oversees the budgeting and financial tracking process and monitor budget adherence;</li> <li>• Ensures that the service center complies with State Lead Center guidelines for strategic management process implementation and delivery;</li> <li>• Act as the contractual agent for the individual center submitting budget/program revisions as needed.</li> </ul>	<ul style="list-style-type: none"> <li>• Develops relationships with key stakeholders including, but not limited to, SBA, banks, chambers of commerce, economic development organizations, trade groups, educational institutions, legislators, and hosts.</li> <li>• Identifies opportunities and partners who will support and grow the local program.</li> <li>• Ensures that communications and networking mechanisms are working appropriately and efficiently using the available technology.</li> <li>• Ensures regular two-way communications with all partners in the community to ascertain success, best practices, problems, opinions, and needs.</li> <li>• Attends or sends a designee to all required meetings as mandate by the State Lead Center, thereby ensuring input from the local level; this includes the monthly Directors' conference calls (center staff is also highly encouraged to attend most meetings).</li> <li>• Ensures two-way communication with the State Lead Center including reporting current and potential problems.</li> <li>• Promotes the SBDC program and advocate for small business through presentations to community organizations.</li> <li>• Develops appropriate advertising, promotion, and marketing materials.</li> </ul>	<ul style="list-style-type: none"> <li>• Oversees the service center staff to ensure that contractual commitments, both budgetary and programmatic, are met. This includes business advisors' and support staff's counseling, training, reporting activities.</li> <li>• Promotes staff development by utilizing continuing education opportunities to enhance professional development.</li> </ul>

#### 7.4.5 Other Staff Resources

##### 7.4.5.1 Fee-Paid Consultants

- Each SBDC should set aside a portion of its budget for private sector consultants. They can provide services that a client or a set of clients require, but are not cost effective, in which to train a standing employee.
- A \$50 per hour fee is the maximum amount that will be approved to be reimbursed for consultants, unless special circumstances dictate a higher rate. These will be decided on a case-by-case basis. Center IC reports will determine the hours to be reimbursed.
- All SBDC Directors and host agencies are cautioned, however, not to engage individuals on a counseling basis to avoid or circumvent their true status of employees.
- Employment of individuals engaged to provide consulting services to the SBDC must follow rules set forth for contract employees by the Federal Internal Revenue Service.
- Before any fee-paid consultant is hired, the center must submit an Authorization Form.

### 7.4.5.2 Volunteers

Centers are encouraged to develop a cadre of qualified volunteers to supplement staff, including business firms, associations and SCORE (although SCORE volunteers cannot be used for match). Volunteers must adhere to ethics and conflict of interest signed. Center directors should provide a system for ensuring the quality of counseling and service provided by volunteers, as well as the thorough case management of clients assisted by volunteers. Centers should ensure that volunteers have the necessary knowledge, professional capacity, and commitment necessary to properly assist small business firms, when the Center Director selects them.

### 7.4.6 Host Organization Resources

ASBDC accreditation standards require SBDCs to provide a plan for the utilization of faculty, students, and other unique resources of the host or nearby educational institution. SBDCs are encouraged to include these resources as part of their service delivery plan.

Where appropriate, services should be provided by faculty. Restrictions on using faculty as match are included in Section 9, Budgets and Accounts.

#### 7.4.6.1. Students/Interns

- Where appropriate, a reasonable share of basic service should be provided by qualified students, including both undergraduate and graduate.
- However, undergraduate students MAY NOT counsel SBDC clients independently. Undergraduates may be utilized to support the center, including research projects, answering the phone, data entry, and other administrative functions. Either the center director or a Certified Business Advisor® approved by the center director must be present during one-on-one counseling.
- Graduate students, providing that the SBDC Director judges them capable of handling themselves in a professional manner, may independently meet with clients. However, the client's primary counselor or SBDC Director must supervise students to ensure clients are receiving quality assistance.
- Time spent by students in preparation for a client (e.g., research, counseling, etc.) should be entered into the Center IC as required under the Center IC Manual (see Appendix).
- Graduate students shall appear on the Budget if they are paid employees. All graduate student teams with time devoted to counseling and research for SBDC clients may be entered into Center IC under a team log in and counted as SBDC counseling hours. Team activities are required to be documented on a log, supported, and reviewed by a CBA® graduate.

**Any counseling by *non*-CBA graduate students, volunteers, or external consultants must be supervised and reviewed by a Certified Business Advisor®.**

#### 7.4.6.2. Student Team/Classroom Projects

- Recognizing the opportunity to leverage resources by using student team or classroom projects to provide in-depth research for small business clients, the SBDC encourages centers to arrange with local institutions of higher learning. The SBDC Director is responsible for ensuring quality of service and information provided by student teams.
- Student teams or classroom projects conducted by undergraduate or graduate students must be fully supervised by faculty. The work of the team must also be reviewed by the SBDC Director or the client's primary counselor to ensure quality, timely, and useful information for the client. Undergraduate student teams or project members should not meet independently with the client without supervision of a faculty member or business counselor.
- Teams or classroom project time should be entered into the Center IC as required in the Center IC Manual located in the Appendix. The SBDC must clearly label any match derived from faculty oversight. This can be considered in-kind match. SBDCs cannot reimburse faculty that is paid to teach a small business research course for their time spent overseeing projects. SBDC Directors may use program income to reimburse student expenses that are reasonable and directly related to the project.

In *non*-educational host organizations, there should be a plan and documentation of the use of the unique resources available within the host organization. In addition, the plan and documentation should also include utilization of unique educational resources to assist in fulfilling the educational component of service delivery by the SBDC.

#### **7.4.7 Time and Effort Certification**

Time and Effort Certification must be documented and certified in accordance with applicable OMB circular. Formal process, documentation and certification will be reviewed by the State Lead Center. If a host organization currently utilizes an existing grant office certification, it will be reviewed for endorsement by the state lead center.

If the host organization does not have a current process in place, the host/SBDC will follow the process, documentation and certification as prescribed by the OMB Circulars. (See Time and Effort Process in the other documents).

#### **7.4.8 Nepotism**

It is the policy of the Ohio SBDC that a director, counselor, manager, or employee of the local SBDC will not practice nepotism. Exceptions to this must be pre-approved by the State Director. Such exceptions will only be given if relevant skill sets and acceptable professional experience are present.

#### **7.4.9. Termination of Employment**

All participating SBDC host agencies are expected to maintain a comprehensive set of written personnel policies and procedures and these procedures must be followed for the discipline or termination of any SBDC staff. Causes for the removal of an SBDC Director or staff shall include, but not be limited to, the following:

- Disregard or material violation of the regulations, policies and rules of the SBDC and/or program host.
- Conduct reflecting a lack of business integrity or honesty.
- A conflict of interest causing real or perceived detriment to a small business concern, a contractor, the SBDC, the SBA, or local host.
- Improper use of funds.
- Failure to consent to audits or examination or to maintain required records.
- Failure to suspend or terminate any key employee under their supervision for the reasons described above.
- Any other cause not otherwise specified which materially and adversely affects the operation or the integrity of the SBDC, the SBDC network or the local host organization.
- The host organization of the local service center will inform SBDC State Director of any disciplinary issues with SBDC staff.
- Local center directors or any other employee may also be disciplined, suspended or terminated promptly upon receipt of knowledge that such individual is engaging in or has engaged in conduct resulting in a criminal conviction or civil judgment. Such activity could cause the public to question the SBDCs business integrity, taking into consideration such factors as the magnitude, repetitiveness, harm caused, and remoteness in time of the activity or activities underlying the conviction or judgment.
- Incidents of suspected conflict of interest must result in the temporary suspension of employee involved until a judgment is made. Such cases must be reported to the State Director for involvement in final decisions.
- If an employee, most particularly the center director, desires to terminate his/her relationship with the SBDC, that intention must be stated in writing and received and acknowledged by the State Director. For one year after termination, any subsequent or private engagement of the services of said employee must be initiated by the client in question and not by the former SBDC employee.
- After termination, any employee, consultant, student, or volunteer with access to client information agrees that s/he **shall not, at any time thereafter**, use or disclose to any other person or entity, either directly or indirectly, any client information in violation of the 250/250A Confidentiality Agreement.

## 7.5 PHYSICAL STANDARDS OF LOCAL CENTERS

### 7.5.1 *General Requirements*

- The SBDC Network shall provide services as physically close as possible to small businesses by providing extension services and use satellite locations and circuit riders when necessary. The facilities and staff of each local center shall be located in such places as to provide maximum accessibility and benefits to the small businesses, which the Center is intended to serve.
- Each service center must be separate and identifiable from its host organization. Prominent signage must appear in all locations accessible to the public.
- Adequate parking must be provided for clients.
- Each service center must have a separate and publicly listed telephone number and it must be answered identifying it as an SBDC.
- Each District shall provide services as physically close as possible to small businesses by providing extension services and utilizing centers, satellite location and circuit riders when necessary. The facilities and staff of each region shall be located in such proximity as to provide maximum accessibility and benefits to the small businesses that the center is intended to serve.
- Each District shall provide access to: CBA® staff to counsel, assist and inform small business clients; relevant training opportunities; information specialists to assist in searches and referrals; courses developed under the SBDC statewide training initiatives.
- Each center must maintain adequate work areas for SBDC business advisors and private areas for client consulting.
- Each service center must adhere to EEO and Disabled Accessibility/Accommodation Requirements. All SBDC services must be rendered on a nondiscriminatory basis, and no individual may be excluded from any program because of race, color, religion, sex, age, disability or national origin.
- Workshops, seminars and conferences must be held in disabled accessible locations. Reasonable accommodations will be made, upon request, for visually and hearing-impaired attendees.
- SBDCs are required to make modifications and accommodations (which do not fundamentally alter the program or activity or entail financial or administrative burdens) to enable otherwise qualified disabled individuals to participate. The SBDC Network must comply with 13 CFR Parts 112, 113, 117, and 136.

See next page for specific requirements.

# SBDC

## CENTER OPERATIONAL REQUIREMENTS

### 7.5.2 Office Space

Acceptable office space includes:

- An office for the service center director where he/she may provide confidential counseling;
- A waiting/reception area;
- SBDC services should be provided as close as possible to the small business community (i.e., downtown areas, Chambers of Commerce, community colleges, community training centers, universities and colleges).

***The State Director must approve locations.***

### 7.5.3 Office Equipment

To function smoothly and efficiently, a local service center must maintain, or have access to, at minimum, the following office equipment:

- Copier - Reasonable access to a photocopier is required for client use. SBDCs may charge a nominal fee for client use of the copier.
- Minimum platforms for hardware and software needs are to be provided as necessary for current Ohio SBDC MIS requirements, specifically Center IC.

### 7.5.4 Hours of Operation

All SBDC Service Centers will operate on a **forty (40) hour-work-week** basis, during the normal working hours of the State or host organization, throughout the calendar year. Annual leave, sick leave and holidays shall conform to the policies of the host institution.

However, such leave must be arranged to allow for the continuation of SBDC operations, except when there is a total shutdown of the organization facilities where the SBDC is located.

### 7.5.5 Telephones

Service Centers are required to maintain publicly listed telephone numbers under the name of the center. To ease accessibility to clients, the publicly listed number should be a direct line to the center.

**Clients should not have to contact the host institution before reaching the SBDC.**

Telephones should be answered at all times either by a person, answering machine, or a voice mail service. When answering the phone, the name of the center should be clearly stated. Phone calls should be returned in a prompt manner.

### 7.5.6 Information Collection

- Each center must maintain center case files within the SBDC Management Information System (Center IC). Please see the appropriate Appendix for further policies.
- Case files must also be kept hard copy at the center in a secured area where only authorized personnel may access them. These "master client files" must be kept timely and accurately.
- Each case should be kept in an individual manila folder or hanging file.
- All client files must contain, but not be limited to:
  - An assessment and intake tool/format (standardized for use by that center) utilized to identify client's needs and priorities.
  - Supporting documentation, i.e., business plans, financial documents, marketing plans, case notes, telephone notes, etc.
  - A log of all activity with this client (generally attached to the left side of the client folder)
  - Client counseling evaluation form, and Impact information collected from the client, during or following, the client engagement.

## 7.6 OPENING/CLOSING CASES

The closing of cases is not required. Center IC Manual provides more details.

## 7.7 RECORDKEEPING AND RETENTION

Each service center is responsible for collecting and retaining certain data. Any data files that include client information should be kept in a secure area, accessible only to authorized personnel for a minimum of five years from the close of the grant period. After that time, this confidential data must be disposed of by shredding or incineration. It is recommended that client information be kept in CenterIC.

Special care must be taken to ensure the security of all files, both electronic and paper. The SBDC will maintain the highest level of security with the use of password protection for all electronic files and data. Sharing of password is not an acceptable practice to keep data security at its highest level. When SBDC staff members are on medical or other restrictive leave, the Director must take steps to secure data by not allowing access to the data files during such time period. Procedures should be in place to inform the State Lead Center of termination of access to the system during this period. Upon return to work access to files will be restored. Paper files should not be removed from the premises of the SBDC for any reason without special written and documented permission from the Director.

All records must be accessible by the state lead center or SBA for review on-site. Use the SBA Annual Program Announcement as the guidelines to cover this area.

### 7.7.1 Accounting Records

Either the accounting or grants management staff of the host institution or with the local center may keep accounting records.

Accounting records include:

- General Ledger
- Receipts
- Account Statements
- Travel Reimbursements
- Checkbooks
- Tangible property purchased with federal funds or used in match

However, it is required that center directors have control of the SBDC budget and accounts. Please refer to Section 11, Budget and Accounts, for a more in-depth discussion on accounting files.

### 7.7.2 Personnel Files

Personnel files on all SBDC staff must be kept at the local level. These files should include:

- Job Description
- Individual Development Plan (IDP)
- Original signed copy of the Conflict of Interest Agreement (Form 250 or 250A)
- Resume
- CBA® Retention Transcript and Supporting Documentation
- other relevant documents

SBDCs should maintain files on volunteer counselors, fee-paid consultants, faculty and students, with signed Conflict of Interest for Volunteers Agreement and all documentation of time for auditing purposes.

### 7.7.3 Correspondence

Center correspondence files should include:

- All correspondence to and from the center and/or their advisory boards;
- Proposals;
- Complaints and follow-up information concerning resolution; and
- All other files necessary for smooth, efficient administrative operations. Centers must abide by all rules of their host institution in this matter.

#### 7.7.4 Client Case Files – Center IC Client Case Files (paper)

- **Client Paper Files:**

- A separate file shall be maintained for each client case.
- This file must consist of all documentation in regard to that client, as prescribed in the SBDC Operations Guide. This includes narrative notes from the initial session, as well as the notes from any follow-up sessions.
- The client data form 641 is modified to incorporate acknowledgment to the client of the specific program their data will report through. The same confidentiality and reporting requirements are used for each program.
- Each service center shall use the client strategic counseling format in Center IC.
- Each client file should document progress toward counseling goals outlined and agreed upon.
- In addition, baseline economic indicators should be collected for all clients during the initial session. Each time the economic indicators are collected, they should be updated in the session notes and include client acknowledgement of impact. Mores specifics for each session type of activity are included in the Center IC Manual.
- Each service center shall implement and utilize a standardized client assessment and intake tool, which must be present in each client file. Each client file should document progress toward consulting goals outlined and agreed upon.

**NOTE: Wherever reasonable, centers should attempt to store all client information within CenterIC.**

#### 7.7.4 Client Case Files – Center IC Client Case Files (electronic)

- **Client Electronic Files:**

- Each service center must use the Center IC system the electronic client relationship management system as dictated by the State Lead Center. (Refer to the Center IC Manual.)
- A center may decide to have all client files as electronic only. This is an acceptable practice with all paper documents scanned and attached to the electronic client file.

**NOTE:** All Graduate Student time devoted to counseling and research for SBDC clients may be counted as SBDC counseling hours. All entries must be made into Center IC based upon standards detailed in the Center IC manual. In all cases, the client file must contain the team's detailed log of counseling activities of each student. Faculty participation may also be entered and counted according to the Center IC manual. Faculty participation in this, or any student counseling, may be counted as match, with appropriate documentation.

**REMINDER: All faculty and student counseling must be reviewed by a CBA® graduate.**

#### 7.7.5 Training Files (paper & electronic files)

- **Paper Training Files:** A

separate file shall be maintained for each training activity, as prescribed in the Program Announcement. At a minimum, each event file must include:

- 888 Training Report Form;
- Attendee list or sign-in sheet;
- Agenda or marketing piece;
- Evaluation forms; and
- Program Income Activity Report (PIAR) for each training that includes fees.

- **Electronic Training Files:** Each center, including, will use the Center IC system as dictated by the State Lead Center office to report all training events. (Refer to the Center IC Manual.)

- **Time Limits:** All counseling and training activities for a given week must be entered into Center IC by close-of-business on the following Tuesday. At the end of each quarter, the Center IC data will be locked in accordance with the Due Dates. Grant funding may be denied should the service center host fail to meet these requirements.

## 7.8 COMPLAINT PROCEDURE

It is expected that every center will have a written complaint policy for handling any dissatisfied clients. The SBDC has a responsibility to serve clients and it is our policy to ensure that service is courteous, prompt, thorough and of high-quality. Complaints handled within a local center must be thoroughly documented and kept in a file for periodic review by the state office and federal auditors, if needed.

If the state office receives a complaint, one of two procedures will be followed:

### **7.8.1 Easily Resolved Complaints**

If the complaint is easily handled with some attention, the state office will listen to the complaint and will assure the individual that steps will be taken to resolve the matter. The staff member will then call the center serving the area where the individual is located and request that either the director or a business counselor call the individual directly. It is expected that such referrals will be handled with special attention, particularly if such referrals are from within the state or federal government. Easily resolved complaints make up nearly 90 percent of all complaints.

--OR--

### **7.8.2 Serious Complaints**

If the complaint suggests a problem of a more serious nature, the State Director or designee will first notify the SBDC local center director and may call the individual back for further discussion. Staff may request a complete copy of the client case file and ask the center director to write a brief summary of all activity with the client. The State Director will then decide if a reasonable solution can be offered or whether the investigation will continue further. If a reasonable solution is reached, the State Director will check on the progress of that client with the SBDC Director.

If the State Director determines that more information is needed, he/she may set up a personal interview with the individual or a meeting with the client and the SBDC director. If necessary, the State Director may initiate an in-depth investigation of the SBDC in question, including reviewing all cases, personal interviews, or requesting an investigation of the Office of Inspector General, U.S. Small Business Administration. Please be aware that serious repercussions can be the result of such an investigation, including termination or suspension of employment, termination of a contract with a local center or prosecution under the law.

All activities involving a complaint activity should be thoroughly documented and kept on file at the local center location. The State Lead Center will keep a log of such complaints, and results. No action will be taken by the State Office without the full and prior knowledge of the local center Director.

## **7.9 CLOSING AN SBDC IN OHIO**

### ***7.9.1 Probation***

If a center fails to perform to standards as set forth in any of the Governing Documents as prescribed above, the Ohio SBDC State Lead Center has the right and obligation to impose a probationary period the allow for resolution of issues as stated in the grant agreement.

### ***7.9.2 Process to Close***

If a center fails to perform to standards as set forth in any of the Governing Documents as prescribed above, the Ohio SBDC State Lead Center has the right and obligation to issue a Notice of Default and begin procedures to close an Ohio SBDC service center. Specific procedures are prescribed to lead to a smooth closing. Details provided in Section 23 of the Cooperative Agreement.

If at any time during the term of the grant agreement, ODSA determines that any service center host has not satisfactorily complied with the terms of this agreement or is in violation of any program rules or requirements contained or referenced herein or if the service center host has failed to follow any lawful program rule or instruction communicated to it by State Lead Center, ODSA may:

- Immediately terminate the Agreement; or
- Provide written notice of ODSA's determination that the service center host has not complied with the terms of the Agreement and specify a cure or probationary period during which the service center host must correct the noted deficiencies to avoid termination.
- Provide written notice of ODSA's determination that the service center host has not complied with the terms of the Agreement and specify a cure or probationary period during which the service center host must correct the noted deficiencies to avoid termination.

## 8. COUNSELING: THE **CORE** OF SBDC SERVICES

### 8.1 PRIMARY GOAL OF COUNSELING

The primary goal of the Ohio SBDC Program is to provide high-quality, in-depth, long-term counseling to small business owners and entrepreneurs. Counseling is provided on a no-cost, one-on-one, confidential basis to all clients. All Ohio small businesses and nascent entrepreneurs are potentially eligible clients. All clients should demonstrate growth potential and must have signed the SBA's client intake form (Form 641) or equivalent.

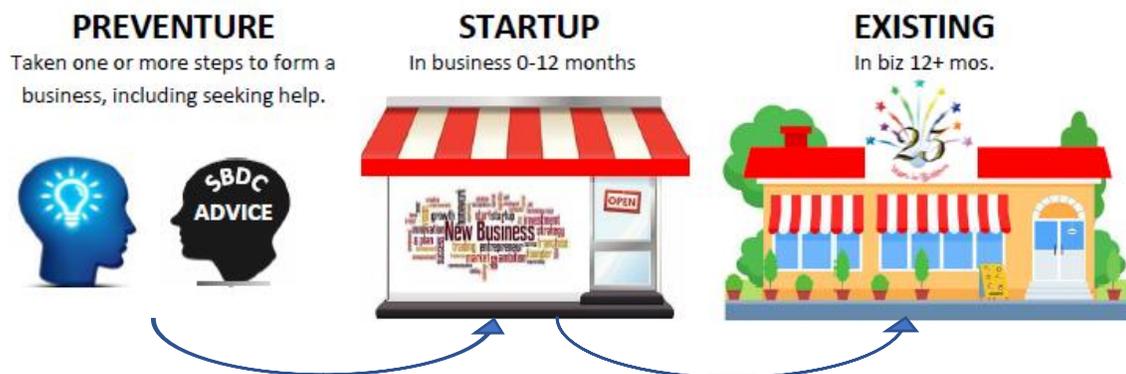
Strategic management goals are established to drive the Ohio SBDC network toward its economic development mission to be recognized as a small business retention and growth program.

The SBDC program is especially beneficial to those clients who, were it not for this program, could not afford access to professional business services. The SBDC is there to assist clients until the clients can graduate into the private fee-for-service market. Prospective clients who are able to secure services through private sector means should be encouraged to do so, at the discretion of the SBDC Business Advisor.

### 8.2. CLIENT (DEFINED)

See the SBA Annual Program Announcement in the Appendix.

The client is the business, if it exists. In the case of a prospective business, the client is the individual (i.e., nascent or pre-venture) entrepreneur receiving SBDC services. Ohio SBDC program tracks four (4) types of clients:



### 8.3. MAXIMIZING ECONOMIC IMPACT

- Strategic management goals are established to drive the Ohio SBDC network toward its economic development mission to be recognized as a small business retention and growth program.
- In order to maximize the economic impact, 65 percent of the center's efforts should be directed to Start-up and Existing businesses. The remaining efforts, 35 percent, should be directed toward quick engagement, education and preparedness of small business Nascents (Pre-ventures).
- The management goals for the Program may be adjusted annually, therefore special attention should be placed on the details of the Annual Request for Proposal (RFP). For FY2017, the goals are as follows for each center:

**8.3.1 Counseling Goal by Client Type** →

35% Nascent (Pre-venture)  
65% Start-up and Existing Businesses

**8.3.2 Cost Per Counseling Hour:** As a general rule, the Ohio SBDC program recommends cost per counseling hour, **not to exceed \$50 per counseling hour.**

**8.3.3** The State Lead Center will develop final milestone projections based on information from the annual proposals and Ohio SBDC Standards, and the goal requirements as defined by SBA.

**8.3.4** All Consulting (Contact + Prep) hours will be reported on Center IC.

**8.4 GENERAL COUNSELING GUIDELINES**

**8.4.1 Minimum counseling times:**



*The minimum initial **FACE-TO-FACE** counseling session is set at 60 minutes.*



*The minimum initial **eCOUNSELING** session is set at 30 minutes.*

**8.4.2 THE SBDC MUST OBTAIN AN ORIGINAL SIGNATURE ON THE OHIO CLIENT INTAKE FORM "641-OHIO."**

**8.4.3** The Export Assistance Network centers shall counsel small businesses about conducting international business or developing international business markets.

**8.4.4** SBDCs shall not receive credit for consulting performed by SCORE.

**8.5 TYPES OF ALTERNATIVE COUNSELING**



**eCounseling:** Stands for electronic counseling with a completed 641 through e-mail, instant messaging, chat rooms, or discussion boards. eCounseling must conform to the same quality standards as person-to-person counseling, that is, it must be substantive in nature and require assistance from the counselor in the formation, management, financing or operation of a small business.



**Telephone Counseling:** Telephone Counseling is the counseling with a completed Ohio Client Intake Form 641-Ohio via the telephone. Telephone Counseling must conform to the same quality standards as person-to-person counseling.



**Rural Counseling:** The Annual SBA/SBDC Program Announcement defines a full range of business development and technical assistance services available to small businesses located in the rural areas of their service region. These services should be designed to increase rural small business participation in exporting, government procurement, tourism, access to credit, incubators, innovation and technology, and other small business programs.

## 8.6 REPORTING COUNSELING IN CENTER IC

- **The SBDC must obtain an original signature on the Ohio Client Intake Form "641-Ohio."**

Ohio Client Intake Form 641-Ohio, updated 10/2017, shall be utilized for each client file.

The image displays three versions of the U.S. Small Business Administration Counseling Information Form (SBA Form 641). The leftmost version is the standard form, the middle version is a 'CLEAR FORM' with a blue header, and the rightmost version is a standard form with a regional map overlay. The map includes checkboxes for countries in the Caribbean, Central America, North America, and South America. The forms contain various sections for client information, counseling services, and contact details.

Each contact with a client shall be entered into the Center IC, which then becomes the official record. Such document should be completed if the initial contact with the client reveals that the client could benefit from SBDC consulting assistance. Such exchange of information may occur in a face-to-face meeting, via telephone, or e-mail. Respondents may propose an alternate process by which clients execute the required form 641 by "electronic signature" using the CenterIC eRFC feature.

- Once a counseling relationship has been established with a properly authorized SBA Form 641, all preparation and contact time associated with the engagement should be logged into Center IC. This entry then becomes the official record.
- All Counseling/Consulting (Contact + Prep) hours and activities with and on behalf of the client must be entered into Center IC.
- Each client will be contacted only once in a fiscal year, and the reporting will include both the number of sessions and the number of hours spent with the client.
- To log counseling hours and receive credit for 30 minutes of initial **eCounseling**, the counselor must:
  - Ensure the client completes a 641 through e-mail, instant messaging, chat rooms, or discussion boards.
  - Spend at least 30 minutes researching and formulating the response. This can include several electronic questions and responses that cumulatively add up to 30 minutes.
- To log consulting hours and receive credit for 30 minutes of **Telephone Counseling**, the following conditions must be met:
  - An SBDC client must complete and sign the Intake Form, or in the case of electronic, must acknowledge through an appropriate "electronic substitute" the requirements imposed by accepting counseling assistance.
  - The counselor must spend at least 30 minutes researching and formulating the response. This can include several telephone questions and responses that cumulatively add up to 30 minutes.