

March 12, 2025

The Honorable Kelly Loeffler
Administrator of the U.S. Small Business
Administration
Small Business Administration
409 3rd St., SW, Floor 2
Washington, District of Columbia 20416

Re: Supporting Small Businesses Under Your Leadership

Dear Administrator Loeffler:

We at ACT | The App Association congratulate you on your appointment as the 28th Administrator of the U.S. Small Business Administration (SBA). Your leadership comes at a pivotal time for small businesses across the nation, and we look forward to working with you to ensure they have the resources, advocacy, and support they need to thrive.

The App Association is a global trade association for small and medium-sized technology companies. Our members are entrepreneurs, innovators, and independent developers within the global app ecosystem that engage with verticals across every industry. Today, the App Association represents an ecosystem valued at approximately \$1.8 trillion and is responsible for 6.1 million American jobs. Our members create innovative solutions that drive the world's rapid embrace of mobile technology. Their products power consumer and enterprise markets across modalities and segments of the economy. The SBA plays a vital role in shaping the environment in which they operate, and we appreciate your commitment to advancing policies that support their success.

We welcome your focus on empowering small businesses and enhancing efficiency within the SBA. In particular, we support your priorities to:

- **Strengthen U.S. Manufacturing and Supply Chains** – Small businesses are critical to revitalizing American manufacturing and fostering economic independence and require reliable indemnification practices. We support your initiative to transform the Office of International Trade into the Office of Manufacturing and Trade to bolster this effort.
- **Crack Down on Fraud and Improve Efficiency** – Ensuring SBA programs remain effective and free from abuse is essential to maintaining trust and maximizing their impact. We appreciate your commitment to eliminating fraud and safeguarding taxpayer dollars.
- **Cut Burdensome Regulations** – Empowering the SBA's Office of Advocacy to identify and eliminate unnecessary regulations is a much-needed step toward reducing bureaucratic hurdles that impede small business growth.

While we commend your initiatives so far, we encourage the SBA to take further steps to ensure that small businesses remain at the forefront of federal policymaking:

1. **Expand the Role of the Office of Advocacy** – The SBA’s Office of Advocacy must take a stronger stance in ensuring that federal agencies comply with the Regulatory Flexibility Act (RFA). Many small businesses face undue burdens because of insufficient regulatory impact assessments. Unfortunately, blatant violations of the RFA occur all too frequently. The Chief Counsel for the Office of Advocacy bears the responsibility for overseeing and documenting agency adherence to the act's stipulations.¹ However, a [2022 report](#) highlighted several instances where federal agencies did not meet RFA requirements, as identified by the SBA's Office of Advocacy. Therefore, the SBA must intensify its efforts to ensure that the RFA’s intended purpose of protecting small business interests is served.
2. **Engage More Actively in Federal Policymaking** – The SBA should be a vocal advocate in interagency discussions, particularly in trade and technology policy. During the previous Administration, [decisions by agencies such as the Federal Trade Commission and the U.S. Trade Representative](#) had unintended negative consequences for small businesses. The SBA must work to ensure that small businesses’ interests are not overlooked in these critical areas.
3. **Small Business-Focused Education** – SBA training and compliance resources, easily accessible and on-demand, are needed to support our community’s growth and job creation. We encourage SBA to leverage user-friendly technology to streamline interactions between small businesses and the SBA.

We appreciate your commitment to small businesses and look forward to collaborating with your office to create an environment where they can continue to innovate and succeed. We welcome any opportunity to meet and discuss these priorities further.

Sincerely,



Morgan Reed
 President
 ACT | The App Association

¹ Congressional Research Service, *SBA Office of Advocacy: Overview, History, and Current Issues* (Mar. 30, 2022), available at <https://crsreports.congress.gov/product/pdf/R/R43625>.