

**SUPPORTING STATEMENT FOR
U.S. COMMERCIAL SERVICE
INTERNATIONAL TRADE SPECIALIST COUNSELING SESSION SURVEY
OMB No. 0625-0253 FORM ITA-4154P**

SECTION A. JUSTIFICATION

1. Necessity of Information Collection

Expanding U.S. exports is a national priority essential to improving U.S. trade performance. The International Trade Administration's (ITA) Commercial Service (CS) provides export assistance to U.S. businesses, particularly small and medium-sized companies, through a worldwide network of more than 250 U.S. and international offices. The Commercial Service (CS) administers counseling services to US Companies.

To accomplish its mission effectively and efficiently, in accordance with Reinvention objectives, CS needs ongoing client feedback on its programs. For example:

- A top recommendation of the National Performance Review (NPR) is to make Government responsive to client needs (Cf. A Creating a Government that Works Better and Costs Less). The NPR recommends that agencies dealing with the public survey their customers on services and results desired, and on satisfaction with existing services (Cf. Chapter 2. Step 1, A Giving Customers a Voice).
- Executive Order 12862 of September 11, 1993, Setting Customer Standards, established a requirement that, where applicable, executive branch agencies use customer satisfaction surveys as a tool for a continual reform of the executive branches' management practices and operations.

The Commercial Service has taken major steps to implement NPR and comply with E.O. 12862. For example, we have formed a specialized unit to collect and maintain a customer feedback mechanism for CS's export promotion programs. The Customer Relationship Management Unit of the Commercial Service is responsible for ensuring the collection and reporting of customer feedback data for programs according to a consistent methodology, testing and implementing techniques for improving survey response rates, streamlining collections where possible, and alerting management to program strengths and weaknesses as identified by clients in the U.S. business community.

As part of its mission, the CS uses user satisfaction surveys on a transactional basis to collect feedback from the U.S. business clients it serves regarding the pay-for-use products/events provided by CS staff overseas. These surveys ask the client to evaluate the CS on its customer service performance specific to a pay-for-use product-event upon which results from the surveys are used to make business process improvements (changes to policies, programs, or procedures affecting the service) in order to provide better and more effective export assistance to U.S. companies.

Whereas the purpose of the CS's user satisfaction surveys is to collect feedback from U.S. businesses that have engaged in pay-for-use products/events provided by our international offices, the purpose of the ODO counseling session survey is to collect feedback from U.S. businesses that have engaged in "counseling sessions" with CS International Trade Specialists in our domestic offices. Counseling sessions occur when International Trade Specialists in our domestic offices work with clients to determine their international marketing interests and provide "global trade solutions". The subject survey asks clients whether they are satisfied with the counseling they have received from U.S. Commercial Service International Trade Specialists in our domestic offices.

On December 30, 2005, the CS received OMB approval to conduct counseling session surveys for one year as a pilot program. The CS conducted this pilot program in June 2006 and achieved a response rate of 27% as the result of 1098 surveys returned out of 4027 sent out to U.S. businesses that had two or more counseling sessions recorded in their International Trade Specialist's Client Management System (CMS) over a six month period. The CS established 844 as the minimum number of surveys that needed to be returned in order to achieve a high level of statistical accuracy (statistical error = +/-3%). Furthermore, the CS established 215 survey responses as the minimum number of surveys that needed to be returned for the representative business types, geographic regions, and industries of the CS client base in order to achieve a high level of statistical accuracy (statistical error = +/- 6%). The CS successfully achieved these measures of statistical accuracy; therefore, these survey results are representative and can be generalized to the population.

To promote optimal use and provide focused and effective improvements to counseling services, we are requesting a three-year approval beyond the pilot program. This clearance would allow enough time to develop trends associated with counseling session service delivery as well as eliminate time, effort, and costs associated with preparation of annual packages and enable CS to continue to conduct its ongoing client-feedback activities. This clearance would include format changes to the counseling session survey (see attached survey).

2. Description and Practical Utility of the Information Collection Activity

The purpose of the attached survey is to collect feedback from U.S. businesses that receive counseling from domestic International Trade Specialists of the U.S. Commercial Service. This information will be used for program improvement, strategic planning, and allocation of resources. Survey responses will be used to assess client satisfaction, assess priorities, and identify areas where service levels and benefits differ from client expectations. Clients benefit because the information is used to improve services provided to the public by domestic International Trade Specialists. In addition, the counseling session survey will enable the CS to react efficiently and effectively to client dissatisfaction and the ever changing needs and challenges of our clients by enabling International Trade Specialist's to solve exporting issues of U.S. businesses in a timely manner. Without this information, the CS is unable to systematically determine client perceptions about the quality and benefit of its counseling services. CS has developed a methodology and process to evaluate user satisfaction surveys for products/events delivered by staff overseas, which will also be applied to counseling session surveys for our domestic International Trade Specialists.

3. Minimizing Burden

U.S. companies that have received counseling from the CS receive the survey via email and complete it online. The CS carefully screens the list of companies to be surveyed to ensure that the client has not already received a user satisfaction survey for a CS pay-for-use product/event in the past six months. In addition, the CS further screens the list of companies to be surveyed to ensure that only one survey is sent per company every six months even when multiple contacts within an individual company have received counseling services from the CS.

4. Non-Duplication

Survey questions specifically relate to counseling services provided to US companies (i.e., no duplication of effort by other U.S. Government agencies is imposed on respondents). No similar information is available. Introductory emails to clients are carefully targeted and monitored to avoid duplication.

5. Minimizing the Burden for Small Business

Survey questions are opinion-oriented, and there is no need for clients to maintain additional records, or incur extra expense to develop data not readily available.

The simplicity of the surveys with shorter questions and only one open-ended comment section also minimizes the burden on small business. In addition, automating the survey lessens the burden on respondents. Surveys include a contact e-mail and 1-800 number for individuals requesting personal assistance.

6. Consideration of Alternatives

No similar information is available. Surveying is being implemented to collect feedback on customer service; data will be used to make improvements to CS export counseling assistance provided by domestic International Trade Specialists.

7. Paperwork Reduction Act Guidelines

The information will be collected consistent with Paperwork Reduction Act guidelines.

8. Consultations

On an informal basis, CS staff regularly consults with customers to determine areas where improvements to its counseling services can be made. There are no unresolved or material issues stemming from the consultations.

In addition, a 60-day request for comments from the public was recently announced on August 21, 2006 (Volume 71, Number 161) in the Federal Register. No comments from the public were generated from this announcement.

9. Incentives to Respondents

None. CS makes no payments or gifts to U.S. companies who complete the survey.

10. Assurance of Confidentiality

U.S. companies are informed that the information is for internal U.S. Government use only and will be considered business confidential. Some of the information collected may be subject to data covered by Freedom of Information Act requests. The CS has included an option at the end of the survey that will allow respondents to check a box in order to keep their survey responses confidential from their Trade Specialist. This will ensure that those respondents who do not want their surveys responses shared with their Trade Specialist can submit a survey in anonymity; thereby allowing them to provide candid feedback without fear of reproach from their Trade Specialist.

11. Justification for Sensitive Information

No questions of a sensitive nature are asked.

12. Estimated Annual Hour Burden

Estimated Number of Respondents: 1700
(estimated total CS clients surveyed) x (average survey response rate of 41%)

$$4158 \text{ total clients surveyed} \times 41\% = 1700 \text{ respondents}$$

Estimated Time Per Response: 10 minutes

Estimated Total Annual Burden Hours: 284 hours
(estimated number of respondents) x (estimated time per response)

$$1700 \text{ respondents} \times .167 \text{ hours (10 minutes)} = 284 \text{ hours}$$

13. Estimated Annual Cost Burden

Estimated Total Annual Costs: \$9,596
(Average private sector salary provided by CS Office of Domestic Operations)

$$\$65,000/\text{annual avg. salary} = \$33.80/\text{hour}$$

$$\$33.80 \times 284 \text{ hours} = \$9,596$$

14. Estimated Annual Cost to Government

\$9,596 is exclusive to hourly private sector salary provided by the CS Office of Domestic Operations times the estimated total annual burden hours (\$33.8 x 284 hours). No government cost was incorporated into this estimate.

15. Rationale for Program Change or Adjustments

The burden hours in the OMB approved collection package were calculated inaccurately and have been corrected in this package. The previous calculation multiplied the estimated number of respondents (1700) times .10 hours = (6 minutes) and not .167 hours = 10 minutes. In this approval package, the CS has corrected this error, which results in the increase from 255 to 284 total burden hours (see below):

$$\begin{aligned} 1700 \text{ respondents} \times .10 \text{ hours} &= 255 \text{ hours} \\ 1700 \text{ respondents} \times .167 \text{ hours} &= 284 \text{ hours} \end{aligned}$$

16. Uses of Analytical Methodology

Data will be used to assess user satisfaction. These instruments are designed to capture client perceptions and not to capture strictly statistical data. The primary criterion guiding the analysis of data resulting from the “Counseling Session Quality Assurance Survey” is the development of policy-useful information – i.e. findings on counseling service use and service quality that will enable the fine-tuning of the current mix of service to increase impact and usefulness to the exporter population. Data analysis will include basic tabulations of the responses. This will be followed by frequency analysis, cross-tabulations, and analysis of variance. Periodic compilations of data will be provided to advise management, domestic offices and overseas posts of better and more efficient ways to meet client needs.

17. Reasons for not Displaying Expiration Data

The OMB number and expiration date will be displayed on the form.

18. Rationale for Exceptions to Certification Statement

N/A