

**SUPPORTING STATEMENT**  
**U.S. Department of Commerce**  
**International Trade Administration**  
**ADVOCACY COMMENT CARD**  
**OMB Control No. 0625-0251**

**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 advocacy 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 quality assurance surveys to collect feedback from the U.S. business clients it serves. The data collection method chosen for the advocacy quality assurance survey is an e-mail message delivering a hotlink to a web enabled survey. These surveys ask the

client to evaluate the CS on its customer service 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.

The purpose of the survey is to collect feedback from U.S. businesses that receive advocacy services from the U.S. Commercial Service. In providing these services, CS advocates on behalf of a U.S. company that is bidding on a project or government contract, trying to recover payment or goods, or facing a barrier to market entry.

Survey responses allow CS managers to understand client's perceptions and assessments of advocacy services provided to make sure that the CS is meeting client expectations. In addition, the survey will enable CS to track user satisfaction with advocacy services provided by our overseas posts. Survey responses are used to assess client satisfaction, assess priorities, and identify areas where service levels and benefits differ from client expectations. Clients will benefit from the Commercial Service's ability to collect this information, as it will be used to improve services provided to the public. Without this information, the CS is unable to systematically determine client perceptions about the quality and benefit of advocacy services. CS has developed a methodology and process to evaluate user satisfaction surveys, which will also be applied to advocacy quality assurance surveys.

The success rate of advocacy services depends on continued sensitivity to the CS's diverse clientele. CS's goal is to reach 100% of the relatively small customer base for advocacy services. In general, user satisfaction surveys for the CS have elicited response rates between 25-60% for surveys. Due to the customized, tailored advocacy service, we predict a high response rate from these clients. However, implementation of guidance from outside consultants and internal CRM staff (Paragraph A8 and B5) should increase these response rates. Introductory emails to clients are carefully targeted and monitored to avoid duplication.

To promote optimal use and provide focused and effective improvements to advocacy services, we are requesting a five-year approval of our current clearance. This clearance would allow enough time to develop trends associated with advocacy 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.

## **2. Description and Practical Utility of the Information Collection Activity**

This information is used for program improvement, strategic planning, and allocation of resources. Survey responses are 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. Without this information, the CS is unable to systematically determine client perceptions about the quality and benefit of its advocacy services.

### **3. Minimizing Burden**

U.S. companies that have received advocacy assistance from the Commercial Service receive the survey via email and complete and submit it online, which is quicker and easier than via mail or fax.

### **4. Non-Duplication**

Survey questions specifically relate to advocacy 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.

### **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.

### **7. Paperwork Reduction Act Guidelines**

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

### **8. Consultations**

A notice requesting public comments was announced on March 29, 2007, [Volume 72, Number 60] in the Federal Register. No comments from the public were generated from this announcement.

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

**9. Incentives to Respondents**

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.

**11. Justification for Sensitive Information**

No questions of a sensitive nature are requested.

**12. Estimated Annual Hour Burden**

<b>Estimated Number of Respondents:</b>	650
<b>Estimated Time Per Response:</b>	5 minutes
<b>Estimated Total Annual Burden Hours:</b>	54 hours
<b>Estimated Total Annual Costs:</b>	\$1,890 [\$35 hourly private sector salary]

**13. Estimated Annual Cost Burden**

No additional cost burden.

**14. Estimated Annual Cost to Government**

None.

**15. Rationale for Program Change or Adjustments**

No similar information is available. Surveying is being implemented to collect feedback on customer service; data will be used to make improvements to CS exporting assistance. Since the original submission, the CS has streamlined its quality assurance surveys by decreasing the number of questions asked of respondents to reduce the time per response from 10 minutes to

5 minutes. This will result in a reduction of burden hours. In addition, the CS has changed the name of its quality assurance surveys to comment cards to encourage clients to provide qualitative feedback regarding the service provided by the CS.

#### **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 “Advocacy Quality Assurance Survey” is the development of policy-useful information – i.e. findings on advocacy 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**

None.

#### **TERMS OF CLEARANCE**

The TERMS OF CLEARANCE provided on 9/21/2005: **“This survey is approved for 18 months. Prior to resubmission, the agency should develop an analysis of nonresponse bias for the survey and for each important question on the survey. If significant bias is identified, the agency must propose changes to the survey to accommodate this bias and/or correct the results in a systematic manner.”** Since the CS has not yet conducted the Advocacy Quality Assurance Survey, we are unable to provide an analysis of nonresponse bias for this survey. The CS has not yet conducted the Advocacy Quality Assurance Survey due to a lack of IT resources that are needed to build a database for tracking advocacy cases that do not involve government procurements. The CS is working to free up IT resources for this database so that we can begin surveying these clients in near future. Once the surveying of the advocacy clients begins, OMB will be provided with an analysis of nonresponse bias.