

SUPPORTING STATEMENT
U.S. Department of Commerce
International Trade Administration
SABIT: Applications and Questionnaires
OMB CONTROL NO. 0625-0225

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

This information collection effort is an integral component of the International Trade Administration's (ITA) Special American Business Internship Training (SABIT) Program. SABIT supports the U.S. Government's strategy for assistance to Eurasia by providing U.S.-based, hands-on training and technical assistance to business executives and scientists. As a result of this training, long-term business partnerships between U.S. and Eurasian companies are forged, creating jobs and investments both domestic and abroad.

In follow-up to a pledge made by President Bush in 1990 to support the then Soviet Union during a transition to a market economy, former Secretary of Commerce Robert A. Mosbacher initiated the SABIT Program during a September 1990 Presidential Business Development Mission to Moscow.

Originally, called the Soviet American Business Internship Training, since the breakup of the Soviet Union, the program has been called the Special American Business Internship Training Program and receives funding through the FREEDOM (Freedom for Russia and Emerging Eurasian Democracies and Open Markets) Support Act (FSA).

SABIT works from its headquarters in Washington, D.C. and its three regional offices in Kazakhstan, Russia and Ukraine, and has emerged as a leading technical assistance provider driving public-private partnerships between the U.S. and Eurasian business communities. SABIT is structured to respond rapidly to the changing needs of its U.S. and Eurasian clients. This is reflected in the evolution of the SABIT Program to accommodate U.S. interests and the dynamic Eurasian business climate.

The SABIT Program currently is comprised of the "Group Program" wherein SABIT sponsors a group of professionals for a one-month business study tour. This opportunity allows these professionals to gain first-hand knowledge about working in a market economy.

SABIT utilizes the applications and evaluations to select the most qualified intern candidates and host companies, as well as implement changes and measure the effectiveness of the program.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

The information collected by the SABIT application for participation in the SABIT Program will be used by ITA staff to determine the quality of applicants for the program and create a delegation of professionals from Eurasia. The end-of-internship feedback form, provided to the selected applicants, will be used to improve the program by determining what worked and what did not work. The alumni feedback form will be used to track the program's alumni to determine how well the program is meeting its foreign policy objectives.

Participant's application information is used daily to create training programs. End-of-internship and alumni forms are used throughout the year to update success story information and write reports on the efficacy of the programs.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

When available, electronic methods of collection will be used to minimize the burden to the respondents and ensure accurate information. The program application is e-mailed to potential candidates and is available electronically on SABIT's Russian-language website.

4. Describe efforts to identify duplication.

The information requested on the SABIT application and questionnaires is unique to the program and not available elsewhere in Government. There is no duplication.

5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

This collection of information does not have a significant impact on a substantial number of small businesses or small entities. The amount of information requested has been reduced to the minimum necessary to recruit and select qualified candidates.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

The information collected in these documents is vital to the processing and operations of the SABIT Program. Without this information, SABIT would not be able to recruit qualified candidates, service American companies or improve program operations.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

The information will be collected consistent with OMB guidelines.

8. Provide the information of the PRA Federal Register notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A 60-day request for comments from the public was announced in the Federal Register, October 17, 2007 (Volume 72, Number 200, pg. 58807). No public comments were received. This is a request to re-approve forms that have been in use and vetted.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

Not applicable.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.

All information collected in the application is only viewed by SABIT employees. Participants are not required to identify him or herself on the end-of-internship feedback forms. Success feedback forms are also held confidentially and respondents are asked if the information that they report can be revealed to the public. If not, their names and company names and other identifying information is not revealed when the success story and/or export amount is reported.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

Not applicable.

12. Provide an estimate in hours of the burden of the collection of information.

The application takes approximately 3 hours to complete, the end-of-internship form approximately 2 hours and the success feedback approximately 1 hour.
2,250 respondents x 3 responses x 6 hours = **40,500 hours**.

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in #12 above).

Additional cost to the respondent is from the application, which must be expressed mailed (DHL or Fedex) or faxed to one of our three regional coordinators (Moscow, Almaty or Kiev). The cost may vary but average estimate to mail application is \$15. It is estimated that 50 percent will mail their applications – 1,125 x \$15 = **\$16,875**.

14. Provide estimates of annualized cost to the Federal government.

Excluding the burden hours above, Government employees' cost is approximately **\$6,109.25**.
-GS-14/4 at 20 hours (\$989)
-GS-13/4 at 10 hours (\$418.50)
-GS-13/1 at 50 hours (\$1,902)
-GS-12/1 at 25 hours (\$799.75)
FSNs: 100 hours (\$2,000)

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB 83-I.

The SABIT program no longer implements its grants program, therefore, SABIT is not requesting renewal of two forms (SABIT Grant Application [Competitive Application Kit for U.S. Companies] and Guidelines for End-of-Internship Reports). U.S. host companies can no longer apply for reimbursable awards (funding), thus no need for the feedback forms for host companies. As a result of this action, there are fewer applicants and fewer hours required to complete SABIT program forms overall.

Due to a miscalculation in the previous submission, and even though two less forms are required and less respondents, the responses and burden hours are increased. In the previous submission, the responses should have been 12,250 (2,450 respondents x 5 responses) not 2,450 responses; burden hours should have been 147,000 (2,450 x 5 x 12 hours) not 6,300 hours.

This submission has less respondents - 2,250 x 3 responses = 6,750 responses. Burden hours - 2,250 x 3 responses x 6 hours = 40,500 hours.

The cost to the respondents to mail their applications was also not included in the previous submission. The cost to respondents is estimated to be \$16,875.

16. For collections whose results will be published, outline the plans for tabulation and publication.

Not applicable

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

Not applicable

18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I.

Not applicable

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

The collection does not employ statistical methods.

Legal Authority – 15 U.S.C. Chapter 40 Sections 1513 – 1527.