SUPPORTING STATEMENT
U.S. Department of Commerce
International Trade Administration
Commercial Service Focus Groups
and Qualitative Client Interviews
OMB Control No. 0625-0254

A. JUSTIFICATION

This is a renewal (with a revision) of Office of Management and Budget approval for this information collection.

1. <u>Explain the circumstances that make the collection of information necessary.</u>

The U.S. Commercial Service (CS) provides customized business solutions for promoting the export of goods and services from small- and medium-sized U.S. businesses in the global marketplace. The goal of the CS is to deliver a consistent, coordinated, and positive customer experience resulting in 100% customer satisfaction. The CS created the Customer Relationship Management Unit (CRMU) to achieve this goal and to ensure that the organization's products and services are customer-driven. The primary mechanism used by the CS to gather client feedback on CS services is a comment card (OMB Control No. 0625-0217) sent via e-mail link to all clients upon the completion of a fee-based service. To supplement this quantitative data, the CS will continue to conduct focus groups and would like to revise this collection to include interviews which will provide qualitative research on the following topics:

- **Investigation of Client Satisfaction Trends**: Investigate client satisfaction trends, particularly negative trends, to help determine appropriate actions to improve client satisfaction with ITA services. Transactional comment cards will alert us to a negative satisfaction trend, but will not provide the details about specifically why clients are unhappy or what solutions would improve the situation. We will rely on Qualitative Client Interviews to provide the detailed descriptive information that we need to develop appropriate solutions.

- **Exporter Needs Segmentation**: Obtain an in-depth understanding of the exporting needs and challenges of various exporter segments, such as firms that are new-to-export and SMEs to help determine whether we need to adjust or improve the services that we offer. The primary CS performance metric is to provide export assistance to SME and new-to-export clients and the CS will need a better understanding of exporting needs, problems and barriers to improve the effectiveness of the service it provides to these key client segments.

- **Service Enhancement Research:** Obtain exporter opinions, recommendations and suggestions on how to improve certain services or aspects of services or obtain client opinions on proposed revisions to CS services.

The title of the collection has been changed to reflect the inclusion of the client interviews.

2. <u>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</u>.

Qualitative Client Interviews may be conducted according to the following methods:

- Individual, face-to-face interviews
- Individual telephone interviews
- Face-to-face focus group discussions with between 4-8 clients
- Teleconference focus group discussions with between 4-6 clients

ITA anticipates conducting the majority of the research via individual telephone interviews due to agency travel budget constraints and the potential difficulty of coordinating focus group times with up to 8 executives.

The participants will be selected for Focus Groups and Qualitative Client Interviews based upon their experience with certain Commercial Service export promotion services. For example, in a case where Commercial Service staff may identify declining satisfaction trends with due diligence services, we will invite due diligence clients to participate in focus group discussions or qualitative interviews so that we can get a better understanding of why clients are unhappy and the measures we need to take to improve due diligence services. The appropriate clients can be identified through Commercial Service internal client databases by writing a particular "query" that will pull client records that have completed a due diligence service within a particular timeframe. CS can also query due diligence clients of a certain company size or industry, etc.

The client data can then be downloaded into an Excel file for easy access. We can then contact clients from the list until we reach an appropriate number who are able to participate in the interviews or focus group discussions.

ITA will conduct pre-recruitment and will contact exporters and/or potential exporters by phone and/or e-mail to set a convenient appointment time for an interview.

Qualitative Client Interviews will be conducted and/or managed by ITA staff with extensive private sector qualitative research experience. Experienced qualitative researchers may also train, guide and monitor other staff in conducting qualitative interviews.

The data collected from Qualitative Client Interviews will be used internally for the primary objective of obtaining a better understanding of U.S. firms' exporting needs and improving the types and quality of export-related services provided by ITA.

The Qualitative Client Interviews will be conducted periodically over the course of three years as follows:

Research Issue	**Methodology**	**Annual No. of Respondents**	**Average time per respondent**	**Total annual burden hours**	**Previous No. of Respondents**	**Previous burden hours**
Investigation of Client Satisfaction Trends (based upon quarterly comment card analysis)	Personal interviews (primarily via telephone)	12 interviews X 4 times per year = 48 annual interviews	30 min.	24 hrs.	—	—
Service Enhancement Research (approx. 3 service enhancements per year)	Personal interviews	12 interviews for each of 3 service enhancements = 36 annual interviews	45 min.	27 hrs.	—	—
Client Needs Segmentation	Focus group discussions (or individual interviews if group discussions not convenient for clients)	4 focus group discussions of 6 clients or 24 interviews	75 min.	30 hr.	—	—
CS Positioning Research	—	—	—	—	96 interviews	144 hrs. (96 X 90 min.)
Total		**108 interviews**		**81 hrs.**	**96 interviews**	**144 hrs.**

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.

The collection will involve either telephone or face-to-face discussions. E-mail may be used to confirm interview appointment times and to send interview reminders. This collection of information is not conducive to electronic submissions.

4. Describe efforts to identify duplication.

The qualitative, descriptive information that is sought is not captured in any of our quantitative interviews. The question guide does not duplicate our currently available client data.

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

The participation in Qualitative Client Interviews is voluntary and to minimize burden, clients will be contacted to set convenient times for interviews. The burden on respondents will be reduced by reducing the number of focus group discussions and increasing the use of personal interviews which require less of a time commitment from respondents.

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

If the collection is not conducted or is conducted less frequently, ITA will not have the necessary information to understand exporters' needs and make appropriate program changes to improve the export-related services that are offered to U.S. companies. Ultimately the quality of export assistance provided to U.S. exporters may suffer and hinder the ability of U.S. firms to export.

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

Not applicable.

8. Provide a copy 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 Federal Register Notice soliciting public comments was published on December 17, 2008 (Volume 74, pg. 76614). No comments were received,

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.

Confidentiality will be provided to the extent possible under Federal Law.

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.

No sensitive questions will be asked.

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

Research Issue	**Annual burden hours**
Investigation of Client Satisfaction Trends (based upon quarterly comment card analysis)	24 hrs.
Service Enhancement Research (approx. 3 service enhancements per year)	27 hrs.
Client Needs Segmentation	30 hr.
Total	**81 hrs.**

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).

None.

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

81 hours to conduct the research + 80 hours of analysis and report preparation = 161 hours

161 hours X $25/hr. = $4,025 annual cost to Federal Government

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

Program Changes

ITA wishes to eliminate the positioning research focus groups as these discussions have occurred and ITA does not need any additional positioning feedback at this time.

ITA is planning to replace the positioning research with 3 types of qualitative research focused on:

- Investigation of Client Satisfaction Trends
- Service Enhancement Research
- Client Needs Segmentation

Additionally ITA will be conducting a mixture of personal interviews and focus group discussions rather than relying solely on focus group discussions as in the past. The use of personal interviews, either by phone or face-to-face, will increase the convenience for clients and reduce the time burden while providing ITA with the required level of client insight.

Overall, the program changes related to the three types of research and the research methodology changes will enable ITA to reduce overall burden from 144 hours to 81 hours.

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.

Not applicable.