A. JUSTIFICATION

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

Expanding U.S. exports is a national priority essential to improving U.S. trade performance. The Department of Commerce's (DOC) International Trade Administration (ITA) including Market Access and Compliance (MAC) and the U.S. Commercial Service (CS) are key U.S. government agencies responsible for assisting U.S. companies to export and/or do business overseas. The Commercial Service provides export promotion services such as market research, client counseling and trade missions. MACs Trade Agreements Compliance (TAC) Center assists clients with resolving market access barriers.

To accomplish its mission effectively and efficiently ITA requires ongoing client feedback on its programs. Examples of policies that support this request are:

- 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 Trade Promotion Coordinating Committee (TPCC) specifically recommends that export-oriented Government programs develop and implement performance measures to guide decisions and improve strategic focus.

ITA therefore requests approval to continue this collection with revisions.

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.

As part of its mission, ITA uses surveys and comment cards to collect feedback from the clients it serves. These client feedback forms ask the client to evaluate customer service and provide insights into the client's experience with ITA programs and services. The results from the surveys and comments cards 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.

These client feedback forms are an integral part of ITA's effort to implement objectives of the National Performance Review (NPR) and Government Performance and Results Act (GPRA). Responses to the surveys and comment cards meet the needs of ITA performance measures based on NPR and GPRA guidelines. These performance measures serve as the basis for justifying the allocation of human and financial resources.

Commercial Service

The client feedback forms enable ITA to track CS client satisfaction and performance of overseas posts and domestic United States Export Assistance Centers, (USEACs). The transactional comment cards also enable the CS to identify potentially unsatisfied clients and take timely action to resolve the situation. Clients benefit from the collection of this information, because it is used to improve services provided to them (public).

Trade Agreements Compliance Program

ITA's Trade Agreements Compliance (TAC) Program helps American exporters and investors overcome foreign trade barriers and works to ensure that foreign countries comply with their trade agreement obligations to the United States. The TAC Program teams consist of experts from throughout ITA, including the Commercial Service, Manufacturing and Services, Office of General Counsel, and Market Access and Compliance. The Trade Compliance Center of MAC administers the program.

The TAC Program records its actions to resolve trade complaints in a case management module of ITAs Client Tracking System (CTS). Cases can sometime be resolved within a few weeks; however, the majority take several months or more than a year and can involve many different activities for resolution. Moreover, sometimes a case will be closed at the client's request for strategic business decisions (e.g., decisions to leave certain international markets or product lines) that do not reflect on the quality or outcome of the ITA team's actions on behalf of the client.

The TAC Center is implementing customer service initiatives and requests approval for two transactional comment cards (one to be used for successfully resolved cases and one to be used for unsuccessfully resolved cases) and an annual survey. The TAC Program surveys are necessary so that staff can monitor customer feedback and respond to client concerns. The **Successfully Resolved Comment Card** will assist the Program in recognizing and rewarding staff and developing promotional information for the program. The **Non-Successfully Resolved Comment Card** will provide timely information in the unlikely event that a client is unsatisfied so that the program can respond in a timely manner to the client and work on its behalf. This information will also feed into the annual report. The **Annual Survey** will provide greater level of detail and analysis on the program stages and level of customer satisfaction. This

information will be used to evaluate any necessary program improvements at a more granular program level.

ITA would like to obtain approval for the following Commercial Service and TAC Center collections:

<u>Commercial Service Comment Card for Export Assistance Commercial Service Fee-based</u> <u>Services and Events</u>

Currently approved, modifications requested

The Commercial Service would like approval to streamline its client comment cards by modifying and reducing the number of questions it asks clients. The Commercial Service has been using 19 different comment cards each asking clients to rate 17 different components of client satisfaction. The comment cards are sent to each client at the completion each fee-based service (on a transactional basis). We propose to standardize the comment card and use just one version with only 5 questions. We have instituted an Annual Customer Satisfaction Survey (0625-0262) to provide us with detailed client satisfaction data on our export assistance services, and do not need to delve into such detail on the comment card. We propose to standardize the comment card and use just one version with only 4 questions.

A key purpose of the revised comment card is to identify clients that may be dissatisfied with the service they have received so that Commercial Service staff can follow-up to remedy the situation. We propose to include questions to measure the effectiveness of recent Commercial Service initiatives to better understand and meet our clients' objectives and to improve the ease and convenience of working with us. A question is included about a client's likelihood to recommend the Commercial Service and is the basis for calculating a Net Promoter Score, which is a measure of client loyalty that is used extensively in the private sector. We have also included an open-ended question to help us better understand what we may be doing well and specifically where we need to improve.

This modification would reduce the burden on clients and enable us to fully capture a client's experience with our domestic and international offices and allow us to pinpoint specific areas for improvement with our domestic and international offices.

This requested modification will allow a more useful analysis of the work being done by the domestic and overseas offices, a vital step in improving communication between offices and ultimately improving the service provided to our clients. In the revised comment card, we would ask a client to rate the likelihood that they would recommend the services of the domestic and international office they worked with, and we would provide clients with the opportunity to provide a comment on their experience with the domestic office and the overseas office. A-client's likelihood to recommend the Commercial Service is the basis for calculating a Net-Promoter Score, a measure of client loyalty that is used extensively in the private sector.

The comment card is sent to <u>all</u> clients <u>who have completed a fee-based service</u>, via email as a survey link, at the completion of a fee-based service. The comment card is sent <u>The comment</u>

<u>card is sent</u> approximately two weeks after completion of the service and a reminder is sent, as needed, two weeks after the initial comment card <u>has been is</u> sent.

Comment cards are sent at completion of the following types of Commercial Service services and trade events:

<u>Matchmaking and contacts</u> - Services which help clients establish an overseas business presence by providing pre-scheduled appointments with potential partners and on-site support in targeted markets. It combines market research, orientation briefings, introductions to potential partners, interpreters for meetings, and export counseling. Specific services include Gold Key Service (GKS), International Partner Search (IPS), contact lists.

<u>Market intelligence</u> - This includes information on market conditions and opportunities in foreign countries, background reports on potential foreign partners and export-related seminars and webinars.

<u>Market promotion and exposure</u> - Services to help U.S. companies identify and plan promotional events that maximize their market exposure to professional industry associations and end users in target markets.

<u>Business Facilitation Service</u> - Logistical and administrative support to U.S. clients while on international business travel such as: interpretation and translation services; pick-up and delivery of bid documents; assistance with product seminars; use of U.S. Commercial Service facilities and space; videoconferencing facilities; and courier services.

<u>Commercial Service Comment Card for Advocacy Services Comment Card</u> Currently approved as OMB Control No. 0625-0251, merge with this collection, and modifications requested

<u>The Commercial Service CS-wishes</u> to add the currently approved Advocacy Comment Card (0625-0251) to this information collection and make <u>slight</u> modifications to it. The Comment Card for Advocacy Services because it is almost identical to the Commercial Service Comment Card for Export Assistance Services which is included in this package.proposed modifications-for comment cards used for other Commercial Service services and events. The Commercial Service's advocacy services address trade complaints to promote U.S. exports and to protect U.S. business interests overseas, including advocating on behalf of a U.S. company that is bidding on a project or government card link will be e-mailed to clients of CS advocacy services at the conclusion of an advocacy case to determine whether a client is satisfied with our services and to identify areas for improvement.

Tell Us About Your Experience Comment Card (e-mail tagline)

New document, approval requested

In addition to soliciting client feedback via comment card after a service is delivered, the Commercial Service and TAC Center staff would like to add a tagline with a link to a Comment Card at the bottom of client service employees' e-mail messages to enable clients to submit feedback at anytime. Often, a client may work with Commercial Service or TAC Center staff for several months before a service or case is completed and a comment card is sent. ITA wishes to provide clients with an opportunity to give feedback at any point during the course of a service or case without having to wait several months until the service or case has been completed.

The tagline would encourage recipients of the e-mail to click the Comment Card link and provide feedback on service quality. Samples of taglines could be similar to "Please tell me about the quality of service that I have provided to you" or "Please let me know how well I have served you." A link to a Comment Card would immediately follow the tagline. This comment card would ask a client to rate the likelihood to recommend the service provided by a particular staff member. The client would also be able to select from a drop-down box, the name of the appropriate person who provided assistance. The ITA staff names in the drop-down lists would be tailored to a specific office or region. This information will be used for quality assurance purposes. Survey responses will be used to assess client satisfaction, identify client issues, record client results and recognize exemplary service providers.

Website Feedback (Export.gov) website feedback

Currently approved, modifications requested

Slight changes in questions are requested to more accurately capture the breadth of our client's experience using the **Export.gov** website. The current survey does not accurately assess clients' needs nor does it provide ITA staff with the level of detail needed to make improvements to the website to better meet clients' needs and expectations. This card is accessed by the website user's request to provide feedback by clicking on a link. We do not actively solicit customer feedback, rather the feedback mechanism is available if clients wish to provide feedback.

Trade Information Center Automated Phone Transactional Survey

Currently approved, no changes requested

We wish to renew without changes the Trade Information Center (TIC) <u>automated phone</u> transactional survey. The TIC operates a trade information hotline (1-800-TRAD) and serves as a comprehensive resource for information on all U.S. Federal Government export assistance programs. The Center is operated by the DOC/ITA for the 20 federal agencies comprising the Trade Promotion Coordinating Committee (TPCC). At the conclusion of a phone call with TIC staff, clients are provided with the option to participate in an automated phone survey to assess their satisfaction with the <u>service they received from the</u> TIC. The survey has been used for the past 3 years and was previously approved in a similar format. This information will be used to improve business processes and the quality of the TIC.

Trade Information Center Annual Satisfaction Survey

Currently approved, revisions requested

The TIC would like to revise a previously approved transactional survey and use it on an annual basis to benchmark overall performance and client satisfaction, and to identify areas for improving our service and export knowledge base. We plan to modify this survey to avoid

overlap with the TIC transactional <u>automated</u> phone survey, and to provide us with aggregate details on clients' needs, expectations and satisfaction.

U.S. Department of Commerce Trade Agreements Compliance Program Card for Successfully Resolved Cases

New document for approval

ITA's T<u>rade</u> Agreements Compliance (TAC). Center requests approval to send a comment card to clients at the conclusion of each successful market access and compliance case. The comment card will be sent via email as a survey link and will consist of questions assessing overall level of satisfaction with the services provided by the TAC Center, including **case-specific** questions regarding accuracy of the summary, timeliness of ITA's actions on the case and adequacy of communications. Additionally, clients will be invited to make suggestions or provide information that supports the rating given on a response, request additional information about MAC services, and request follow up or inclusion in additional information gathering exercises.

U.S. Department of Commerce Trade Agreements Compliance ProgramCenter-Comment Card for Non-Successfully Resolved Cases

New document for approval

ITA's TAC Center requests approval to send a comment card to clients at the conclusion of each non-successful case. The comment card will be sent via email as a survey link and will consist of questions assessing overall level of satisfaction with the services provided by the TAC Program. Additionally, clients will be invited to make suggestions or provide information that supports the rating given on a response, request additional information about MAC services, and request follow up or inclusion in additional information gathering exercises.

U.S. Department of Commerce Trade Agreements Compliance ProgramCenter Annual <u>Survey</u>

New document for approval

This survey will be used to establish a benchmark for the TAC Center's on key customer satisfaction metrics. The survey will be sent to all clients that have worked with TAC over a specific 12 month period. A survey link will be sent to clients via email.

Quality Assurance Survey Eliminated

3. <u>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</u>.

The vast majority of ITA clients complete the surveys electronically, but hard copies may be used in limited circumstances, such as with clients who may not have Internet access. The data collection involves the use of electronic survey links as described in the table below.

Collection Name	<u>Electronic</u>	Details
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	Capability	
Commercial Service Comment Card for	Electronic link	E-mail message sent to
Export Assistance Services		clients containing electronic
		link to survey
Commercial Service Comment Card for	Electronic link	E-mail message sent to
Advocacy Services		clients containing electronic
		link to survey
Tell Us About Your Experience (e-mail	Electronic link	Electronic link to be
tagline)		attached to the signature
		area on e-mail messages sent
		by Commercial Service
		employees
Website Feedback (Export.gov)	Electronic link	A link to "Submit Website
		Feedback" is available on
		the right side navigation bar
		on the Export.gov home
		page
Trade Information Center Annual	Electronic link	E-mail message sent to
Satisfaction Survey		clients containing electronic
		<u>link to survey</u>
U.S. Department of Commerce Trade	Electronic link	E-mail message sent to
Agreements Compliance Program		clients containing electronic
Comment Card for Successfully		<u>link to survey</u>
Resolved Cases		
U.S. Department of Commerce Trade	<u>Electronic link</u>	E-mail message sent to
Agreements Compliance Program		clients containing electronic
Comment Card for Non-successfully		<u>link to survey</u>
Resolved Cases		
U.S. Department of Commerce Trade	Electronic link	<u>E-mail message sent to</u>
Agreements Compliance Program		clients containing electronic
<u>Annual Survey</u>		link to survey
<u>Trade Information Center – automated</u>	<u>Not applicable</u>	<u>Clients that contact the</u>
<u>phone survey</u>		<u>Center are given the option</u>
		of completing a phone
		survey at the conclusion of
		<u>their call.</u>

4. Describe efforts to identify duplication.

There will be no duplication on any of these forms as they are generated on a limited basis, strictly in response to the use of a service by a client of ITA.

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

The proposed reduction of the number of questions required and elimination of a form willlessen the burden on all respondents, including small businesses or entities. Many of these instruments have been in use by the International Trade Administration for 3 years and during this time no negative feedback has been received from either clients or clientfacing staff regarding the use of these forms.

To minimize respondent burden, the International Trade Administration rigorously reviewed the instruments to ensure that the questions are necessary to provide the information needed to ensure high levels of client satisfaction and to take appropriate action to improve satisfaction.

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

The quality of service that we provide to our clients would suffer if these collections are not conducted or are conducted less frequently. The majority of the collections are conducted on a transactional basis and enable ITA to identify potentially unsatisfied clients so that immediate action can be taken to resolve the situation. The client feedback is relied upon to guide ITA's quality improvement initiatives. The requested information is not otherwise available and is invaluable in planning our programs to best meet the needs of our clients.

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

The collection will be conducted in a manner consistent with OMB guidelines.

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 comment was published on January 29, 2009 (Volume 74, Number 18, page 5144). No comments were received.

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

No gifts or payments will be provided to respondents.

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

Confidentiality is provided to the extent allowed by law.

<u>There is no expectation of confidentiality given that these are customer satisfaction-related</u> <u>instruments. The customer satisfaction data will be used internally and the International Trade</u> <u>Administration does not intend to make this data publically available.</u>

11. <u>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</u>.

No questions of a sensitive nature are asked.

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

Document Type	Estimated annual no. of respondents	Annual burden hours	Previous Annual #	Previous burden hours
			respondents	per document
Comment Card for	4000	333.3	16,820	3,038
Commercial Service				
Comment Card for				
Export Assistancefee-				
based <u>S</u> ervices				
<u>Tell Us About Your</u> <u>Experience</u> Comment- Card-(e-mail tagline)	5000	416.67		
Export.gov Website feedback (Export.gov)	100	16.6	80	13
<u>Commercial Service</u> <u>Comment Card for</u> Advocacy Comment Card (formerly 0625-0251)	50	4.16		

Trade Information	100	16.6	100	16
<u>Center</u> HC Annual_ <u>Satisfaction</u> Survey				
MAC Successfully	60	5		
Resolved Comment	00	5		
Card U.S. Department				
of Commerce Trade				
Agreements Compliance				
Program Comment				
Card for Successfully				
Resolved Cases				
MAC_U.S. Department	140	11.66		
of Commerce Trade				
Agreements Compliance				
Program Comment				
Card for Non-				
Successfully Resolved				
Cases Comment Card				
MACHS Desertes est				
MAC-U.S. Department of Commerce Trade	200	33.3		
Agreements Compliance				
<u>Program</u> Annual Survey				
Trade Information	500	41.6	349	29
C <u>enter – automated</u>	500	1.0		<u></u>
phone Transactional				
<u>s</u> Survey				
TOTAL	10,150	878.89	17,349	3,096

13. <u>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)</u>.

No cost to clients.

14. <u>Provide estimates of annualized cost to the Federal government</u>.

Government employees will spend approximately 10 minutes reviewing each completed document.

Estimated annual government employee hours to review completed documents = 2,512 hrs.

Annualized cost to the Federal Govt.: 2,512 hr. X \$25/hr. = **\$62,800.**

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

There is a reduction of burden hours due to program changes (-1,663):

- Reduction in the number of questions on the Comment Card for Commercial Service which changed the response time from 10 minutes to 5 minutes (-467).
- Proposed addition of new collections for Comment Card for E-mail Tagline (+417), TAC Successfully Resolved Comment Card (+5), TAC Unsuccessfully Resolved Comment Card (+12), and TAC Annual Survey (+33).
- The inclusion of Advocacy Comment Card, formerly 0625-0251 (+4).
- Elimination of Quality Assurance Survey (-1,667).

There is a reduction due to adjustments in the estimated number or respondents/responses (-554):

- Comment Card for Commercial Service (-571).
- TIC Transactional Survey (+13 hrs.), TIC Annual Survey (+1hr.), and Export.gov Website feedback (+3 hrs.).

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

The results will not be published.

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.

The expiration date for OMB approval will be displayed on all collections, except for the Trade Information Center transactional automated telephone survey because clients do not receive any written materials in connection with it.

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

Not applicable.