

**SUPPORTING STATEMENT
U.S. Department of Commerce
Bureau of Industry and Security
BIS Program Evaluation
OMB Control No. 0694-0125**

A. Justification

This request is to extend the Office of Management and Budget approval.

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

The Bureau of Industry and Security (BIS) conducts seminars associated with various organizational programs. The feedback from these seminars is vital to ensuring the quality and relevance of outreach programs. Participants' completion of a voluntary survey provides BIS with immediate feedback on various program elements. BIS is able to improve and adjust its course offerings to meet the needs of the exporting community. BIS typically conducts over 30 seminars each year.

BIS have two major public events, annually, which offer opportunities for program feedback -

(1) The Update Conference on Export Controls and Policy is the Department of Commerce's flagship event on U.S. export controls. It provides an opportunity for exporting companies to interact with U.S. Government officials who implement export control regulations, practices and policies intended to advance U.S. national security, foreign policy and economic interests. Presenters and attendees include a wide range of individuals involved in international trade, including high level U.S. Government officials, foreign government and business representatives, export managers, corporate attorneys and consultants.

(2) The Export Control Forum an annual event conducted in southern California that provide an opportunity to learn about the latest in the export control field and to interact with key BIS management, licensing, and policy staff.

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.

A survey form is distributed by BIS seminar instructors at seminar programs throughout the year (examples in ROCIS). Various courses are offered between three to four times per month in various locations. The seminar participants are asked to fill out the evaluation form during the program and turn it in at the end of the program. The responses to these questions provide useful

and practical information that BIS can use to determine that it is providing a quality program and gives BIS information useful to making recommended improvements. It also shows attendees that BIS cares about their training experience and values their viewpoint.

With respect to the specific questions on the form, it is important for BIS to know the objectives of the participant so that BIS can determine from the form how well the course did in meeting those objectives. It is important that BIS know if the price of the program is reasonable to the exporter, as it is BIS's goal to ensure that exporters can take advantage of training at a reasonable cost. Knowing which concept or skill was most and least important helps BIS to determine what adjustments may be made in its program in terms of amount of time spent on a topic and whether a topic continues to be relevant to the program attendees.

Information on how attendees found out about the program assists BIS in its outreach efforts and improves avenues of information sharing with exporters. Knowing if attendees have participated in previous seminars and the time they have spent in the export control field assists BIS in determining their level of expertise which is important when considering their comments, as those new to exporting may have a different view of program material than those more experienced. This also assists BIS in ensuring that varying degrees of educational requirements are considered and met. The information on attendees' level of comfort with the material before and after a program helps BIS in determining whether or not it has met its goal in improving the attendees understanding of export control policies and procedures. Knowing if the information will assist attendees in their export compliance responsibilities ensures that BIS is improving this essential responsibility of the exporting community. Determining whether the information in the program met the expectations of the goals set out in the course description helps BIS to know whether or not it is describing its program appropriately to ensure that the attendees are getting what they expect out of the program.

A well organized agenda is important to ensure that attendees understand the thought process in determining their export compliance responsibilities. BIS uses hands-on learning activities to assist in the attendees' understanding of program material and it is essential that BIS know whether or not attendees find these activities to be an effective learning tool. Knowing whether or not the attendees would recommend a BIS program to others helps BIS to determine if the quality of its programs will result in word-of-mouth promotion. BIS spends a great deal of effort in ensuring that the quality of its program material can serve as a useful reference guide to exporters, so it is important that attendees provide feedback on the quality of the material.

Knowing if the appropriate time is spent on each topic assists BIS in making adjustments to the program agenda to suit the needs of the exporting community. Asking attendees to rate each seminar topic for clarity provides valuable feedback to the BIS representatives. These topics vary depending on the specific BIS program presented (only about one-third of these topics are included on an evaluation form for a particular program) and other questions may be substituted depending on adjustments made to a particular program based on the program location or audience. An overall program rating provides BIS with a immediate sense of the attendees overall impression of the seminar which is used to measure the overall quality of BIS's programs. Asking attendees to provide any other suggestions for improvement or any other

comments ensures that attendees are given every opportunity to comment on the program and to include information that BIS may have missed.

Some surveys give attendees the option of providing information (including name and company name, address, telephone number and fax) which allows BIS to respond to any direct questions or issues the attendee wants to discuss with BIS.

The collected information will not be disseminated to the public.

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.

This collection does not involve the use of any technology. The evaluations are provided as part of hand-out material to the program attendees. It is not cost effective for BIS to provide seminar attendees with personal computers and electronic versions of our survey forms at each seminar location in order to complete the surveys electronically.

4. Describe efforts to identify duplication.

This collection is not duplicated elsewhere. The respondents are exporters and importers who attend a specific BIS program seminar. This information is not available from any source other than from the respondent.

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

This collection would not have a significant impact on small entities, as the program is open to any attendee, regardless of size and participation in the evaluation is voluntary.

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 was not conducted, BIS would be limited in its ability to get feedback from attendees on the quality and value of its program and ways to make improvements to ensure that exporters are being properly educated on their export control responsibilities. To ensure the overall quality of its program, it is necessary to collect the evaluations at each program, as each audience has different background and needs.

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

Not Applicable.

8. Provide 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.

The notice requesting public comment was published in the Federal Register on December 14, 2009, p. 66086. 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.

Respondents are not required to provide their name when completing the evaluation form which provides for some confidentiality of their response. There is no assurance of confidentiality for this voluntary survey data in statute, regulation or agency policy.

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.

There are no questions of a sensitive nature.

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

This collection of information consists of approximately 3,000 responses annually. Based on an average time of 10 minutes for preparing each response, the annual burden for this collection is 500 hours.

Responses – 3,000 @ 10 minutes each = 500 hours

The annual cost to the respondents is estimated to be \$0. Respondents attend the program voluntarily and the evaluations are part of the program activities.

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 Question 12 above).

Not Applicable.

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

The total annual cost to the Federal Government is estimated to be \$2,550. This based on an average recording, copying and analysis time of 2 minutes for each of the 3,000 evaluations at an average salary of \$23.00 per hour. The total cost also includes approximately \$250 per year for the equipment used for copying and recording the data.

Salaries (2 minutes each = \$23 per hour)	
3,000 x 2 = 6,000 minutes/60 = 100 hours x \$23 per hour =	\$ 2,300
Equipment	<u>250</u>
TOTAL	\$ 2,550

15. Explain the reasons for any program changes or adjustments.

The adjustment decrease of 500 responses and 83 burden hours is due to fewer responses experienced since the previous submission.

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

There are no plans to publish this information for statistical purposes.

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.

BIS is seeking approval to not display the expiration date for OMB approval of the information collection because the collection is ongoing. Having the form reprinted each time the OMB authorization lapses serves only to make otherwise good forms become obsolete.

18. Explain each exception to the certification statement.

Not Applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Not Applicable.