

SUPPORTING STATEMENT
U.S. Department of Commerce
Minority Business Development Agency
Minority Business Center Program: Communication and Outreach
OMB Control No. 0640-XXXX

A. JUSTIFICATION

This is an emergency review request to conduct in-depth interviews and an on-line survey of minority-owned businesses and stakeholders to identify how effective MBDA is in communicating its program services. The requested approval date is January 26, 2011.

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

One of the first executive actions President Barack Obama took upon entering office was to issue a Memorandum on Transparency and Open Government (January 21, 2009) which states:

“We will work together to ensure public trust and establish a system of transparency, public participation, and collaboration. Openness will strengthen our democracy and promote efficiency and effectiveness in Government.”

The memorandum further elaborated on the role executive departments and agencies should play in implementing the principles of transparency, participation, and collaboration including:

“Government should be participatory. Public engagement enhances the Government’s effectiveness and improves the quality of its decisions. Knowledge is widely dispersed in society, and public officials benefit from having access to that dispersed knowledge. Executive departments and agencies should offer Americans increased opportunities to participate in policymaking and to provide their Government with the benefits of their collective expertise and information. Executive departments and agencies should also solicit public input on how we can increase and improve opportunities for public participation in Government.

Government should be collaborative. Collaboration actively engages Americans in the work of their Government. Executive departments and agencies should use innovative tools, methods, and systems to cooperate among themselves, across all levels of Government, and with nonprofit organizations, businesses, and individuals in the private sector. Executive departments and agencies should solicit public feedback to assess and improve their level of collaboration and to identify new opportunities for cooperation.”

The Minority Business Development Agency (MBDA, “Agency”) has a long-standing history of working closely with external stakeholders and clients of the Agency’s programs through its nationwide network of business centers; as well as town hall meetings and listening tours; and

participation in conferences and summits. In support of the Administration's Memorandum of Transparency and Open Government, MBDA was one of the first bureaus at the Department of Commerce to engage social media and it was instrumental in helping the Secretary of Commerce with the establishment of the National Advisory Council on Minority Business Enterprise.

On April 1, 2011, MBDA expects to announce the recipients of its most recent grant competition. The recipients of the MBDA grant will operate a minority business center and provide direct service to minority business owners. The information collected from these interviews and surveys will contribute significantly to the development of the Agency's collateral materials, outreach strategies and business program offerings for use by centers.

MBDA is requesting an emergency review and approval of this information collection to 1) expeditiously conduct the surveys with MBDA stakeholders and clients to ascertain their views on the MBDA brand, materials, and programs no later than February 15, 2011; 2) generate a report based upon its findings from the information collection by February 28, 2011; 3) use the findings to revise and update the Agency's collateral materials, outreach strategies and business program offerings by March 31, 2011; and 4) disseminate the updated and revised materials, strategies and programs to their grant recipients who will begin operating minority business centers on April 1, 2011.

Soliciting the views, perception and input from MBDA's clients and stakeholders is necessary to uphold the Agency's mission of fostering the growth and competitiveness of the Nation's minority business sector and to carry out the President's Memorandum and Transparency and Open Government.

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.

MBDA will administer the in-depth interviews and on-line surveys through Quijote Corporation/Sensis Agency, the third party vendor that has been contracted for this purpose. The in-depth questionnaire will be conducted by interviewing to 25 minority-owned firms for purposes of getting qualitative input and feedback about the Agency's programs, strengths and weaknesses and effectiveness of its collateral material and outreach strategies. Interviews will be in-person or via phone depending on availability of the interviewer.

The on-line survey is very similar in nature and intention, and presents a synthesized set of questions that will be used for the quantitative section of the project. The purpose of the on-line survey is to collect a sizeable sample of client/stakeholder feedback regarding MBDA's positioning, programs, collateral materials and outreach efforts. Quijote Corporation/Sensis Agency will be responsible for distributing the electronic survey using a third party online survey tool called Zoomerang. The survey will be sent in the form of a hyperlink in the body of an email and the link will redirect survey takers to a unique Zoomerang Web address.

This information collected through these two instruments will be used by MBDA senior leadership team to make decisions about the Agency's collateral materials used for informing clients, stakeholders and the public about MBDA's programs. It will also assist in developing more effective outreach strategies and identify program strengths and shortcomings. The data collected will not be used to make major program or policy decisions. The data will be used to inform design decisions relative to collateral materials.

The results of the in-depth interviews and on-line surveys will not be disseminated to the public or used to support information disseminated to the public. We expect this to be a one-time only collection.

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 on-line survey will be distributed and completed using the Internet (third party web-based survey tool called Zoomerang). Interviews will be conducted by telephone or in person.

4. Describe efforts to identify duplication.

The data being collected is very specific to MBDA and its outreach efforts and program services so there is no risk of duplication. As such, no other bureau within the Department of Commerce, or outside parties would collect or have a repository containing this type of information.

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

A portion of the on-line survey respondents are expected to be small businesses (as defined under the U.S. Small Business Administration's size standards). In order to ease the burden upon small businesses, the survey and interview questions have been designed to be both non-intrusive and optional. Both the in-depth interviews and survey are entirely optional for any individual, business, or organization invited to participate in the data collection. The on-line survey will be non-intrusive (e.g. not costly in terms of time or effort by the participant). It is estimated that the on-line survey will take 15 minutes to complete, it will be conducted on-line therefore not requiring any materials or postage, and the information requested is the business owner's opinions. The in-depth interview will be non-intrusive in terms of effort and will average 30-45 minutes depending on the business owner's views. Participants in the in-depth interview will be called or visited by Quijote Corporation/Sensis Agency thereby eliminating the need for long-distance telephone or travel charges.

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

Without the collection of this data, MBDA will fail in its efforts to revise and update its collateral materials, outreach strategies and program services in a manner that effectively matches the interest and needs of its core constituency. Soliciting the views, perception and input from MBDA's clients and stakeholders is necessary to uphold the Agency's mission of fostering the growth and competitiveness of the nation's minority business sector and carrying out the President's Memorandum on Transparency and Open Government.

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

The collection of information will not be conducted in a manner inconsistent with OMB guidelines.

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.

A Federal Register Notice soliciting public comments will be submitted to coincide with this request to the Office of Management and Budget.

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.

As a matter of Agency policy, MBDA has worked with Quijote Corporation/Sensis Agency to ensure the respondents' confidentiality. The following protocols will be observed:

For phone interviews: Quijote Corporation/Sensis will assign a numerical identity to each interviewee. All information acquired from participants will be entered into a database where the only way to identify individual respondents and/or their answers will be through the assigned

numerical value. *Example: "Respondent 1, respondent 2, ... , respondent n."* Interview results will be presented in a summarized manner.

For the online survey: The survey is web-based and conducted by a third party vendor. No personal information (name, age, ethnicity, business data, etc.) will be collected during the survey. Responses will be kept completely confidential and aggregated. Survey results will be presented in a synthesized manner using textual summaries, charts and graphs.

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.

The in-depth interview and on-line survey do not ask any questions commonly considered sensitive or private, such as sexual behavior, attitude, religious beliefs or political affiliation.

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

The estimated total burden for this collection of information is **918 hours**, further delineated as follows:

- Number of in-depth interviews 25 X 45 minutes each = 18.75 (19) hours.
- Number of on-line surveys 750 X 15 minutes each = 187.5 (188) hours.
- Number of non-respondents invited and reviewed survey 14,225 X 3 minutes = 711 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 Question 12 above).

There is no annual cost burden to respondents resulting from the collection.

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

There is no additional annualized cost to the Federal government beyond the amount expended (\$43,500) on a third party (Quijote Corporation/Sensis Agency) to conduct the interviews and on-line survey; and to synthesize and present the results to MBDA.

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

This is a new information collection.

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

The results from this collection 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.

Respondents to the in-depth interview will not receive a paper copy of the interview questions; rather the interviewer will be following a script, so there is no place to display the OMB expiration date. The email message accompanying the on-line survey will be designed to include the OMB expiration date in text format.

18. Explain each exception to the certification statement.

Not Applicable.