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

### A. JUSTIFICATION

This request will extend Office of Management and Budget approval.

#### 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, designed to provide U.S.-based, hands-on technical training to executives from various parts of the world. SABIT supports the economic transition of Eurasia (the former Soviet Union) and economic growth in other regions of the world, including Pakistan, the Middle East, et al., while spurring discussion and possible partnerships between the SABIT delegates and the U.S. host companies. The SABIT Program supports the U.S. Government's strategy for assistance to Eurasia and other developing regions.

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 AEECA (Assistance for Europe, Eurasia and Central Asia) and other government sources. SABIT supports the U.S. Government's strategy for assistance to Eurasia and other key regions by providing U.S.-based, hands-on training and technical assistance to business executives. As a result of this training, long-term business partnerships between U.S. and international companies are forged, creating jobs and investments both domestically and abroad.

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 international business climate.

In addition, in recent years SABIT has been expanding its reach to include training programs in other regions of the world. In 2010, SABIT began a new initiative to bring professional delegations from Pakistan. In 2011, SABIT plans to bring groups from Pakistan, Afghanistan, and Iraq to the United States for training.

The SABIT Program currently is comprised of the "Group Program" wherein SABIT sponsors a group of professionals for a three or four week business study tour. This opportunity allows these professionals to gain first-hand knowledge about working in a market economy and learn about international best practices in their field of work.

SABIT utilizes the application, program exit questionnaire, and alumni success form 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 Group Program will be used by ITA staff to determine the quality of applicants for SABIT's programs and create delegations of professionals from Eurasia and other regions. The program exit questionnaire will be used to improve the program by determining what worked and what did not work. The alumni success form will be used to track SABIT alumni to determine how well the program is meeting its foreign policy objectives.

The information will be used nearly daily.

## 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>.

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. Applicants may submit their applications via e-mail, however, most choose to mail the document in paper form.

### 4. Describe efforts to identify duplication.

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

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

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

The information will be collected consistent with OMB guidelines.

8. <u>Provide a copy of the PRA Federal Register notice that solicited public comments on the information collection prior to this submission.</u> 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 on March 18, 2011 (pg. 14901, Volume 76, Number 53). No public comments were received.

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

Not applicable.

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

All information collected in the application is only viewed by SABIT employees. The program exit questionnaire and alumni success form are anonymous for the group delegates unless the

delegates choose to include their names. Alumni success 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, company names and other identifying information are not revealed when the success story and/or export amount is reported.

## 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>.

Not applicable.

### 12. <u>Provide an estimate in hours of the burden of the collection of information</u>.

The application takes approximately 3 hours to complete, the program exit questionnaire approximately 1 hour, and the alumni success form also approximately 1 hour. All forms are optional (voluntary). It is estimated that about 2,000 people yearly will respond and the total combined burden hours will total **4,400**. Of the 2,000 responses, approximately 1,200 are applications = **3,600 hours**; 200 are program exit questionnaires = **200 hours**; and 600 are alumni success forms = **600 hours**.

## 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 Question 12 above)</u>.

The only cost for the respondents is from mailing their application, which must be sent to one of our three regional coordinators (Moscow, Almaty or Kiev) unless it is sent by e-mail which happens rarely. Cost varies but is approximately \$15 per packet mailed. The program exit questionnaire and alumni success form are collected in person or in electronic format, so there is no cost to the respondents. Assuming there are about 1,200 applications, then the total cost burden is about **\$18,000**.

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

Government employees' cost is approximately \$6,109.25 -GS-14/4 at 20 hours (989.00) -GS-13/4 at 10 hours (418.50) -GS-13/1 at 50 hours (1,902.00) -GS-12/1 at 25 hours (799.75) FSNs: 100 hours (2,000.00)

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

The adjustment decreases in respondents/responses, and burden hours are to reflect the actual numbers experienced since the previous submission. Also the number of hours for filling out the SABIT Exit Questionnaire was reduced from 2 hours to 1 hour to more accurately reflect the amount of time needed to fill out the form. The burden cost adjustment increase is to accurately reflect the costs of mailing the applications.

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

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

### **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.