

SUPPORTING STATEMENT
U.S. Department of Commerce
International Trade Administration
Application for the President’s “E”
and “E” Star Awards for Export Expansion
OMB Control No. 0625-0065

A. JUSTIFICATION

This is a request for extension and revision of a currently approved information collection.

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

Expanding the United States (U.S.) exports is a national priority and essential to improving U.S. trade performance. The Department of Commerce (DOC), International Trade Administration (ITA), U.S. Commercial Service (CS) serves as the key U.S. government agency responsible for promoting exports of goods and services from the United States and assisting U.S. exporters in their dealings with foreign governments.

The "E" Award Program was established by Executive Order 10978 on December 5, 1961, to afford suitable recognition to persons, firms, or organizations that contribute significantly in the effort to increase U.S. exports and to encourage U.S. companies to sell their products and services internationally. The Executive Order authorized the Secretary of Commerce, in cooperation with the Secretary of the Interior, the Secretary of Agriculture, the Administrator of the Small Business Administration, and the heads of other Government departments and agencies, to establish procedures for the nomination and the granting of awards.

A second Presidential award, the "E Star" Award, was authorized by the Secretary of Commerce on August 4, 1969, to afford continuing recognition of noteworthy export promotion efforts.

The application form, ITA-725P, is the vehicle designed to determine eligibility for the “E” Award and the “E Star” Award within established criteria. The “E” and “E Star” Awards are the highest honors that our nation bestows upon American exporters and organizations that contribute to exporting. These awards recognize firms and organizations for their competitive achievements in world markets, as well as the benefits of their success to the U.S. economy. The purpose for collecting the information is to determine the applicant’s eligibility to receive a Presidential award.

The respondents benefit from the collection of this information because it affords them with recognition of their exporting success from the U.S. government. Respondents can use this recognition to further market themselves and thereby increase business and reputation.

The application form was revised (formatting for aesthetic and re-organization reasons). The changes are detailed in the table below.

Deletion/Revision of Currently Approved Questions

Currently Approved Text	Proposed Action	Explanation
Item 2: Name of International Marketing Manager:	Delete	This does not apply to many companies and the information was not used
Fax and POC fax:	Delete	This information is not used. Email is the preferred means of communication.
Item 5: Number of employees whose jobs are attributable to exporting	Delete	Without instructions as to how to answer this question, companies were confused. If necessary, the information can be determined by using the # of employees and the percentage of export sales to total sales, or by using total export sales and a calculation of x dollars in exports = 1 job. This calculation can be done by E Awards staff.
Item 6: NAICS category (ies):	Delete	This information is not used.
Item 9: Percentage of Exports to Total Sales	Delete	This is purely a math question. We have the total and export sales numbers to make this calculation if needed.
Business Confidential checkbox	Delete	A statement about confidentiality and use of the information was moved to a more prominent position and applies to the entire application, not just the sales figures.
Item 10: Key exporting challenges	Delete	The reformatted narrative questions will adequately address exporting challenges without this checklist
Item 11: Justification for the Award	Revised	This item was revised to differentiate between the information needed for the different types of awards and was reformatted to give the applicants an outline to use in writing the justification; therefore generating responses that are more uniform in nature.

The burden hours will remain the same because the deleted questions did not substantially add to the burden as most applicants did not answer them.

The revised section gives applicants additional criteria to qualify for the award, specifically increase in number of markets exported to, overcoming of trade barriers, and introduction of a U.S. product into markets where it was previously not available or very limited.

Addition of Questions

Additional Information Requested	Explanation
<u>Both Under Item 3.</u>	
Number of Countries Currently Exporting to	This question was added at the request of the committee and is intended to be used as part of the evaluation of the application
Top Three Countries of Export	This question was added at the request of the committee and is intended to be used as part of the evaluation of the application

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.

Once the company or organization submits the “E” or “E Star” Award application to its local CS office, the application is reviewed and endorsed by the CS office director and forwarded to the Main CS located within ITA/DOC. Upon receipt, the “E” Award program officer forwards the applicant’s name and address, and in the case of the IRS, the applicant’s tax I.D. number, to the following federal agencies for clearance:

- Department of Commerce Bureau of Industry and Security
- Department of Labor
- Department of Justice (anti-trust division and criminal division)
- Federal Trade Commission
- Internal Revenue Service
- Securities Exchange Commission (if applicable)

These clearances are essential to ensure that the applicant is conforming to government regulation and policy.

At the same time, the application is evaluated by the “E” Award program officer for presentation before the President’s “E” Award committee (committee). The committee is comprised of members from the Department of Commerce International Trade Administration U.S. Commercial Service (chairs the committee); Department of State; Department of Labor; Small Business Administration; Export-Import Bank; Department of Agriculture’s Foreign Agricultural Service and the Department of Transportation Maritime Administration. Each member of the committee reviews the application and supplemental materials prior to scheduled meetings, at which time the content, analysis, and merits of each application are discussed.

Applications are reviewed once per year.

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.

Applications can be downloaded from Export.gov, the U.S. government's exporting portal, or from Trade.gov, the webpage of the International Trade Administration. The application is sent via email to the "E" Award program officer. The application can then be distributed from the program officer to committee members.

Applicants can also choose to submit a hard copy of the application and supporting materials in addition to the electronic version, but this is not required, and all information is then scanned to be stored electronically and shared with committee members for review.

4. Describe efforts to identify duplication.

Each applicant is eligible for only one "E" Award and one "E Star" Award. Because of the uniqueness of the award, much of the information requested is pertinent only to the pursuit of an "E" or "E Star" Award and must address the applicant's own credentials for the award. Since an applicant is submitting proprietary information specifically compiled for this purpose, it is not available elsewhere.

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

Regardless of business size, each applicant must complete the same application. The form has been revised to remove unnecessary questions and guidance was added to make it easier to complete correctly.

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

If this information is not collected and the applications and supporting materials are not provided, the Department of Commerce would be unable to determine an applicant's eligibility for the President's "E" and "E Star" Awards. This program has been in existence since 1961, and awards have been presented annually. The cessation or alteration of the timeframe for collection and presentation would take away the U.S. government's ability to recognize U.S. exporters for their achievements and contributions to the U.S. economy.

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

The information will be collected consistent 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 60-day request for comments from the public was recently announced in the Federal Register, June 3, 2011 (Volume 76, Number 107, pg. 32141). No comments from the public were generated from this announcement.

The committee members are consulted at least once per year to determine the clarity of the application's instructions as well as the criteria for receiving the "E" and "E Star" awards.

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

There are no payments or gifts to applicants.

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

The following statement is at the top of the application: Except where required by law, no information or data will be disclosed to persons not involved in processing this application without the applicant's prior written consent.

In addition, the entire application except Items 1 (organization Information), 2 (Contact Information), and the signature fields have been ruled proprietary, Freedom of Information Act Exemption B.4.

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 questions of a sensitive nature are asked.

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

It is estimated that 30 applications will be submitted per year. A random sampling of applicants revealed an estimate of 20 hours developing and preparing an application.

Estimated Number of Respondents: 30

Estimated Time Per Response: 20 hours

Estimated Total Annual Burden Hours: **600 hours**

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).

None.

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

The total estimated cost to the government is **\$13,650** for salary, printing and award materials and is broken down as follows:

Salary - \$7400 (GS 12 x 1/10th time)

Printing and Framing - \$3750 (\$150 each x 25 winners)

Award Materials (flags and pins) - \$2500 (\$100 each x 25 winners)

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

Program changes: Modifications were made to the Application for the President's "E" and "E" Star Awards for Export Expansion to eliminate six unnecessary questions, provide guidance to assist respondents in correctly completing the application, add two questions to aid in selecting Award winners and reorganize the form to improve aesthetics. These changes did not require any changes to burden hours.

Adjustment: The burden is expected to increase by 400 hours (from 200 to 600) because more U.S. exporters (from 10 to 20) are expected to apply for the Award due to the ITA's efforts to promote exporting in support of the President's National Export Initiative.

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

The results of this information collection will not be published. It does not employ any statistical methodologies.

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.