

Supporting Statement A

Specific Instructions

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

In addition to the requirements of the Government Performance and Results Act (103 P.L. 62; 107 Stat. 285), or GPRA, which requires agencies to report on the outcomes of their activities, the information is required in order to respond to administrative requests such as those made by the Office of Management and Budget for USTDA's Annual Budget Presentation and the requirements of the Program Assessment Rating Tool (PART). The information is also required for preparation of USTDA's Annual Budget Requests, Congressional Presentations and Agency Annual Report. In addition to the foregoing need, the information is required for use by USTDA senior management as part of agency monitoring of its various activities to measure effectiveness and/or to obtain information for future activity planning.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

USTDA must obtain information from a wide variety of sources to determine if the agency is meeting its key objectives or performance measures. These measures include assessing whether the agency's activities have positive impacts on U.S. exports and on host country economic development. The agency's performance measures are established according to the legislative requirements of GPRA, have been approved by the Office of Management and Budget (OMB) and have been utilized to satisfy reporting requirements to Congressional Committees and to the OMB-PART process as well as for use in USTDA's Annual Reports, Budget Submissions, and Congressional Presentations. The information collection effort described in this application is designed to provide the necessary information to evaluate the performance of the agency on these agreed measures. The information is used by OMB and by Congressional Committees to evaluate the performance of the agency. USTDA senior management also uses the information for program planning purposes.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The information collection would depend heavily on tailored, project-specific questions conveyed to interviewees by phone or email. Interviewees would be encouraged to respond by phone or email, whichever method reduces the burden to the interviewees and allows them the flexibility to respond when they have time. This increases the likelihood of obtaining high quality information. In addition, interviews by telephone would play an important role when email addresses are not available or when responses to emails are not received. However, we wish to emphasize that USTDA information collection has increasingly utilized IT collection methods, primarily email, in recent years. We believe this has substantially improved the quality and quantity of information collected while at the same time reducing the burden for the people who supply the information.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

(1) Efforts to Reduce Duplication - The agency would require our evaluations analyst/interviewer contractor and agency in-house staff to impose the minimum burden on interviewees consistent with obtaining comprehensive and accurate information. For example, the interview team will analyze their project assignments and, to the extent possible, group projects by region, country, economic sector, and U.S. companies before initiating emails, calls, faxes, or in-person interviews. Thus, in many cases, the same email, call, fax, etc. could ask for information about a number of different projects and reduce the total number of contacts needed.

(2) Use of Similar, Already Available Information - The agency's routine information collection strategy is to obtain annual updates on the majority of its active projects. Since the agency wishes to obtain annual updates, it is necessary to make contacts each year until the project is completed or is considered no longer active. Agency evaluations contractors and in-house staff would be required to carefully review all previous agency information before making such contacts in order to avoid redundant requests for information as well as to ask the right questions.

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

The agency does not believe that the information collection would have a significant economic impact on a substantial number of small entities. Small businesses and other small entities play an important role as contractors and as beneficiaries of agency activities. The agency generally finds that smaller companies are at least as willing to respond to requests for information as larger companies. Believing that the economic impact of the proposed information collection would not be significant on small businesses or entities, the agency therefore would treat them and other businesses in the same manner. In addition, there seems no practicable way to obtain the necessary information from small businesses that would involve less burden than it now does. It is anticipated that the small and large businesses would be given the option of responding by telephone or by email, thereby mitigating the burden to the extent practicable.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

(1) If the information collection is not conducted or is conducted less frequently, the consequence to Federal program or policy activities would be serious: Firstly, the agency would not have the information that is necessary to meet GPRA requirements and to respond to official requests for an evaluation of agency performance. Secondly, the data is utilized by the agency as an input into agency decisions on future projects. The agency believes that it should have up to date and comprehensive information for both internal decision-making and external reporting requirements.

(2) The legal obstacle is GPRA, which requires this information in the context of metrics for measuring agency success in meeting its goals.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- * requiring respondents to report information to the agency more often than quarterly;
- * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- * requiring respondents to submit more than an original and two copies of any document;
- * requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- * in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- * that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- * requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

The information collection which is the subject of this application does not involve any of the above procedures:

- (a) The information would be collected annually.**
- (b) When responses are requested by email or by fax, the agency would indicate that the respondent may respond in less than 30 days, if convenient, but that the respondent is not required to do so.**
- (c) The agency would not require the respondent to submit more than one original or one copy of any document.**
- (d) While the selected respondents may have participated in activities that have, or have had, recordkeeping and reporting requirements, the respondents would not be subjected, under this particular information collection, to additional recordkeeping or reporting requirements.**

- (e) **The information request would not involve a statistical survey.**
- (f) **The information request would not involve a statistical data classification.**
- (g) **The agency would not provide the respondents with a pledge of confidentiality that is not supported by legal authority. The agency would indicate that confidential information would be maintained by the agency in accordance with applicable U.S. law.**
- (h) **The agency would not require the respondents to disclose proprietary trade secrets, or other confidential information. To the extent that the respondents voluntarily provide such information, the agency would safeguard it in accordance with applicable law.**

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. Describe 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. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

USTDA published its first Federal Register Notice soliciting comments on the information collection prior to submission to OMB on July 07, 2011 at 76 FR 39975, at which time a 60-day comment period was announced. The comment period ended September 06, 2011. No comments were received in response to this notice.

USTDA has not utilized an outside independent specialist to review the agency's information collection procedures and results, however, USTDA's evaluations staff has consulted with its independent evaluations support contractor, Strategic Applications, Inc., to review the agency's information collection efforts and seek advice about how USTDA evaluations efforts and procedures could be improved.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payments or gifts to respondents would be provided.

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

The information sought by the agency and obtained by the agency contractor or in-house staff could involve commercially sensitive and proprietary information because a basic goal of the agency activities is to promote the export related interests of U.S. entities. If respondents are willing to share such information, the agency and its contractors would inform the respondents that the information would be kept

confidential by the agency in accordance with applicable U.S. law (e.g., Freedom of Information Act, and others). The agency and/or its contractor would ask the respondent to clearly indicate which information is confidential.

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. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

Questions of a sensitive nature (other than commercial sensitivities) are not relevant to agency activities and would not be asked.

12. Provide estimates of the hour burden of the collection of information. The statement should:
 - * Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
 - * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
 - * Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under item 13.

(a) USTDA's experience has been that it requires substantive communications (telephone, email or fax) with approximately 5 individuals per project assigned to a contractor and approximately 2 individuals per project evaluated internally. Information is sought once per year. The information collection effort for this application is for 400 agency projects assigned to an independent evaluations contractor and 500 projects to be evaluated internally, for a total of 3000 respondents. We estimate that the average interview takes approximately 20 minutes to obtain the desired information. Thus, we estimate the total burden on the interviewees to be 1000 hours.

(b) The request for approval does not cover more than one form, therefore, separate hour burden estimates and aggregate hour burdens are not necessary.

(c) The interviewees for this project will be highly technical professionals (Engineers, Accountants, etc.) and middle level business executives (Vice-Presidents, Managers of International Marketing, etc.). Our experience is that such people bill their time at approximately \$150 per hour. Thus, our total estimate of the total cost/burden of this information collection program is \$150,000. This is obtained by multiplying the number of hours by the rate of \$150 per hour.

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

* The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

* If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

* Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices.

Not applicable. The only cost or burden to the public/interviewees of this project is the time respondents spend responding to agency questions. See Question 12 above. While the respondents would be selected by having participated in activities that have, or have had, recordkeeping and reporting requirements, the respondents would not be subjected, under this particular information collection, to additional recordkeeping or reporting requirements.

14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Costs to the Federal government for contracting out or paying parties for information collection activities should be included here.

Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

The estimated annualized cost to the federal government of this information collection project is approximately \$462,957. This number is obtained by adding the following:

- **Estimated Cost of Independent Evaluation Contractor to collect the information- \$357,957.**
- **USTDA Personnel Costs to Manage and Monitor the Independent Evaluation Contract - \$50,000 (obtained by assuming that the USTDA evaluations team spends about 20% of its time managing and monitoring this contract).**

- **USTDA Personnel Costs to Conduct Internal Evaluations-** \$50,000 (obtained by assuming that the USTDA evaluations team spends about 20% of its time conducting the evaluations).
- **Miscellaneous Expenses - \$5000-** Photocopying, telephone expenses etc.

In the 60-day and 30-day notices published on the Federal Register, our estimated annualized cost was \$416,289. Recently we have had changes in staff as well as more accurate estimates on the various components that go into the cost of this information collection. This is why our estimated annualized cost is now different than what was published in the Federal Register notices. There is no associated change to the burden estimate because of this.

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.

This is a request for extension of a currently approved information collection, with minor changes that reflect improvements to the information gathering process that lessen the public burden while improving the quality of information gathered as well as reflecting inflation for cost estimates. The agency wants to continue to evaluate the impact of its programs through outside evaluators and in-house staff. This is particularly important as the agency wishes to track specific projects over a period of several years. The burden estimates on the previously approved collection of information were estimates for a new IC. As a result of monitoring the information collection activities over the two year period, the agency is able to provide more precise burden estimates. To coincide with this extension request, the agency is seeking this information collection clearance.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The annual preparatory work to obtain background information on the assigned projects is anticipated to begin in August. Information collection, if information collection clearance is obtained, would begin in September and would continue through August of the following year. The Final Report is to be submitted to the agency in September. The report would be utilized for USTDA management purposes and it is not our intent to publish it.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Not applicable. USTDA is not seeking approval to not display the expiration date for OMB approval of the information collection.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions."

Exemption for c and f are being sought. For c, as indicated in Item 5 above, the agency does not believe that the information collection would have a significant economic impact on a substantial number of small entities. In addition, there seems no practicable way to reduce the burden on them. For f, as indicated in 7d, the information collection does not have recordkeeping requirements and therefore also does not indicate retention periods for the same.