Supporting Statement

U.S. Department of Commerce (DOC) NATIONAL INSTITUTE OF STANDARDS AND TECHNOLOGY (NIST) MANUFACTURING EXTENSION PARTNERSHIP (MEP) Program MANAGEMENT INFORMATION REPORTING SYSTEM FOR THE BUSINESS AND TALENT MANAGEMENT SELF-DIAGNOSTIC TOOL OMB CONTROL NO. 0693-xxxx

A. JUSTIFICATION

This is a request for a new information collection.

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

Sponsored by NIST, the Manufacturing Extension Partnership (MEP) is a national network of locally based manufacturing extension centers working with small manufacturers to assist them improve productivity, improve profitability and enhance their economic competitiveness. In order for small and medium-sized manufacturers to understand the systemic alignment between their business goals and workforce investments, they will need to compare their internal business goals/targets and their talent management efforts. By comparing their own internal data that reflects all of their business strategies, small and medium-sized manufacturers will understand how aligned their workforce skills are with their business investments and execution. This automated service (Self-Diagnostic Tool) will be offered by MEP centers to their manufacturing clients.

At this time, NIST MEP does not have any information available on these aspects of business practices. Therefore, to improve workforce productivity and job creation, it is important to collect this information.

2. <u>Explain how, by whom, how frequently, and for what purpose the information will be</u> <u>used. If NIST's Information Quality Guidelines apply, state this and confirm that the</u> <u>collection complies with the Guidelines.</u>

Small and medium-sized manufacturers will enter answers to the questions themselves using an automated system once a year. However, participating manufactures would be able to collect their company data more often if they would like to understand their progress in aligning their internal workforce interventions and business plans. There is no obligation to collect data or participate in this service. The service will be offered by MEP Centers to clients who wish to participate. The invitation to participate in the collection will be discussed during consultations with clients at which time the client will be provided with information regarding confidentiality.

The invitation verbiage is as follows:

MEP Center says: "SMARTalent helps CEOs understand their current workforce investments, practices, and gaps as aligned to business goals and targets. The SMARTalent Business/Workforce Diagnostic provides analytic guidance to improve productivity, recruitment, retention and training costs. To be able to analyze your strengths, weakness, opportunities and threats, company data – and your opinions on how your business is doing – will need to be entered into a software program. As you, the CEO, answer the self-diagnostic questions, the information is stored in the NIST secure server. This data can then be available to you whenever you want to review or analyze it. The data can also be provided to your MEP center, if you choose that option. If not, you can still use the tool. On the homepage of the SMARTalent website are links to the privacy and security policies of the federal government to include our MEP center(s). When you go to log in to the SMARTalent tool, you can click any of the links at the bottom of the home page for provide security and privacy information." This is the link for the NIST security policy and software application that participating Respondents will receive http://nist.gov/public_affairs/privacy.cfm.

Manufacturing clients that choose to use the SMARTalent self-diagnostic tool will use it twice a year. First to understand how well their business goals and workforce practices are aligned. The second time they will use it that year will be to check on their progress. After they use it one time, they will understand where to make changes or enhancements to their business processes and talent management.

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>

This program uses a NIST-hosted web application via MEP centers to manufacturers' computer(s). Upon the manufacturers' request of the software program, they access the website (<u>www.smartalent.gov</u>) through a password-protected system; their company data will be provided to them in a report format, showing the company data inputs of the questions they answered themselves.

4. Describe efforts to identify duplication.

There are many private sector companies that offer analytic software to large companies which provides the ability to compare the internal expenditures and financial benefits of their company's human resource activity (i.e., Bersin by Deloitte, The Gartner Group and the Association for Talent Development (ATD). However none offer a comparison of a company's business goals with that same company's workforce investments and practices.

This Self-Diagnostic Tool (software application) will provide opportunities for small manufacturers to review both business goals and workforce investments for alignment or non-alignment with the intent of future cost savings and better-targeted investments.

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

Small and medium-sized manufacturers are under no obligation to participate in this selfdiagnostic offered by their local MEP center. The diagnostic gathers only the data that the businessperson puts into the software application and the benefit of using this diagnostic can be realized without having to answer every question. The participating business can start and stop the process at any time without any burden or repercussions.

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>

It would reduce NIST MEP's ability to provide effective assistance to small manufacturing clients regarding the alignment of their people strategies along with their business strategies. It would force us to rely on providing advice without the benefit of the data and comparative analytics that SMARTalent Tool would produce. NIST MEP would still be able to provide advice, but it would not be as systematic or based on data, both from the client as well as other comparable firms. NIST Subject Matter Experts (SMEs) search the North American Industry Classification System (NAICS) for these types of comparisons.

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

This data collection will be conducted in accordance with the 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. 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.</u>

A Federal Register Notice soliciting public comments was published on April 11, 2014 (Vol. 79, pg. 20172. No comments were received.

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

There are no payments or gifts to any participants in the self-diagnostic software program.

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

The software application is hosted on the NIST server and conforms to all security and confidentiality requirements for a Federal program. Use of the SMARTalent tool is not mandatory. Client companies are given the opportunity to decline use of the tool by the MEP Center consultant.

No confidential information is collected by the SMARTalent application. Information about specific companies will not be shared with the public. Consent is gathered by the MEP Center consultant during conversations on business challenges. A request to use the tool will be considered as "consent" to participate. The application has a current NIST IT security assessment and authorization package, completed at the Low confidentiality level, and an authority to operate granted by the NIST Chief Information Officer (CIO) in accordance with Federal Information Security Management Act (FISMA) requirements. The software application is hosted on the NIST server and conforms to all security and confidentiality requirements for a Federal program.

No assurances of confidentiality will be given. There is no form. The client will be informed of confidentiality during consultations.

On the homepage of the SMARTalent website are links to the privacy and security policies of the federal government to include our MEP center(s). When you log in to the SMARTalent tool, you can click any of the links at the bottom of the home page for provide security and privacy information." This is the link for the NIST security policy and software application that participating Respondents will receive. http://nist.gov/public_affairs/privacy.cfm.

11. <u>Provide additional justification for any questions of a sensitive nature, such as sexual</u> <u>behavior and attitudes, religious beliefs, and other matters that are commonly</u> <u>considered private.</u>

No sensitive data will be collected. Users of the software program are not obligated to answer any of the self-diagnostic questions.

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

Summary of Hour Burden

On average, a respondent should be able to provide business data to the software program in 30 minutes. We expect approximately 600 respondents per year with an average of 300 hours of burden.

600 Respondents X 30 minutes = 300 Burden Hours

The software program diagnostic can be started and stopped at any time without any interference in its utility for the user.

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>

There is no cost burden to the respondent.

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

\$1,000 annually for server usage.

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

This is a new collection of information.

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

Any data that is voluntarily released by the participating companies to the Federal program will be tabulated and published as anonymous and aggregate data describing trends. Individual company data will be held in strict confidentiality unless the client chooses to share data to allow for benchmarking.

17. <u>If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.</u>

Not applicable.

18. <u>Explain each exception to the certification statement.</u>

Not applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection does not employ statistical methodology.