

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

A. JUSTIFICATION

This is a request for approval of an existing information collection revision.

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 and 2012, SABIT brought groups from Pakistan and Afghanistan to the United States for training. In 2014, SABIT brought two groups from Pakistan to the United States to participate in training programs.

The SABIT Program currently is comprised of the “Group Program” wherein SABIT sponsors a group of professionals for a two or three 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 SABIT program.

Revision: The SABIT Program proposes to revise the collection instruments. The instruments are very similar to those used by SABIT in past years. However, some wording has been changed to reflect the changing needs of SABIT over time. The changes are relatively minor and most of them are rephrasing of wording. Two questions have been added to the Participant Exit Questionnaire; and instructions for filling out the form, methods of submission, and the order of questions have been revised on the Participant Application. These revisions are not expected to increase the response time to complete the instruments.

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 almost on a daily basis. The information collected will not be disseminated to the public.

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.

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 or 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; and unique to the SABIT program.

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

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

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. 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 announced in the Federal Register on Friday, May 23, 2014 (pg. 29740-29741, Volume 79, Number 100). No comments were received.

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.

The assurance of confidentiality is provided to respondents orally and in writing. 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.

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. 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.

Not applicable.

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

The application takes approximately 3 hours to complete, the program exit questionnaire approximately 1 hour and the alumni success form approximately 1 hour. All forms are optional (voluntary). We estimate 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. 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).

The only cost for the respondents is from mailing their application, which may be sent by mail to one of our three regional coordinators (Moscow, Almaty or Kiev) or it may be sent by e-mail. For mailing applications, cost varies but is approximately \$15 per packet mailed. Applications sent by e-mail, about 75% of the applications, have no cost to the applicant. 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 and about 25% (300) of them are submitted by mail, then the total cost burden is about **\$4,500**.

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

Government employees' (record-keepers) cost is approximately **\$7,181.10**

-GS-14/4 at 20 hours (\$1,120.20)

-GS-13/4 at 10 hours (\$470.40)

-GS-13/1 at 50 hours (\$2,154.50)

-GS-12/2 at 25 hours (\$936.00)

- FSNs at 100 hours (\$2,500.00)

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

Program Changes: Two questions have been added to the Participant Exit Questionnaire; and instructions for filling out the form, methods of submission, and the order of questions have been revised on the Participant Application. No estimated changes in burden hours are expected.

Adjustment: More respondents, approximately 75%, are submitting their applications in electronic format, which decreases the total cost burden as compared to previous years (-13,500 cost reduction).

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

For the form collecting success stories, if we so use them publically, we ask permission from all parties mentioned (e.g., from the U.S. company and the alumnus). It is not posted widely—only in reports or press releases to Congress, or other agencies, which may, in turn, publicize them.

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.