

SUPPORTING STATEMENT
U.S. Department of Commerce
International Trade Administration
Surveys for User Satisfaction, Impact, and Needs
OMB Control No. 0625-0275

SUPPORTING STATEMENT PART A - (Questions and Guidance for Responses)

Abstract

The International Trade Administration provides a multitude of international trade related programs to help U.S. businesses. These programs include information products, services, and trade events. To accomplish its mission effectively, ITA needs ongoing feedback on its programs. This information collection item allows ITA to solicit clients' opinions about the use of ITA products, services, and trade events. To promote optimal use and provide focused and effective improvements to ITA programs, we are requesting approval for this clearance package; including: use of Comment Cards (i.e. transactional-based surveys) to collect feedback immediately after ITA assistance is provided to clients; use of annual surveys (i.e. relationship-based surveys) to gauge overall satisfaction, impact and needs for clients with ITA assistance provided over a period time; use of multiple data collection methods (i.e. web-enabled surveys sent via email, telephone interviews, automated telephone surveys, and in-person surveys via mobile devices/laptops/tablets at trade events/shows) to enable clients to conveniently respond to requests for feedback; and a forecast of burden hours.

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.

The International Trade Administration's (ITA) U.S. Commercial Service (CS) is mandated by Congress to broaden and deepen the U.S. exporter base. The CS accomplishes this by providing counseling, programs and services to help U.S. organizations export and conduct business in overseas markets. These programs include information products, services, and trade events. To accomplish its mission effectively, ITA needs ongoing feedback on its programs.

This information collection instrument allows ITA to solicit clients' opinions about the use of ITA products, services, and trade events. To promote optimal use and provide focused and effective improvements to ITA programs, we are requesting approval for this clearance package; including: use of Comment Cards (i.e. transactional-based surveys) to collect feedback immediately after ITA assistance is provided to clients; use of annual surveys (i.e. relationship-based surveys) to gauge overall satisfaction, impact and needs for clients with ITA assistance provided over a period time. Without this information, ITA is unable to systematically determine the actual and relative levels of performance for its programs and products/services and to provide clear, actionable insights for managerial intervention. This information will be used for program evaluation and improvement, strategic planning, allocation of resources and stakeholder reporting.

More importantly, the update entails a revised list of questions that will be asked and each set of questions will be tailored to a specific program type and will vary slightly with each program. ITA staff use this information to gain an understanding of client's needs and objectives so that they can provide appropriate and effective export assistance tailored to an exporter's particular requirements.

As a result, ITA requests approval to renew this information collection and the set of questions used to generate the customized forms have been approved under the aforementioned information collections.

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.

ITA is seeking approval for the following data collection methods to provide flexibility in conducting customer satisfaction surveys and to reduce the burden on respondents: 1) an e-mail message delivering a hot link to a web enabled survey with an email reminder sent if the client does not respond to the survey within two weeks; 2) a telephone survey/interview; and 3) a web-enabled survey conducted in-person at trade shows/events via a laptop, tablet or mobile phone so participants can immediately respond without having to provide their e-mail address.

The collection is voluntary and the frequency will be on-going and will depend upon the demand U.S. companies have for Global Markets' (CS) services and programs. These forms are used by firms to indicate their interest in participating in a service or program; therefore, if a firm is not interested in obtaining a CS service or participating in an export/import-related program, there is no need for the firm to complete a form. Companies access these forms via ITA websites or electronic mails and they may submit them via the Internet.

The responses to two of the questions in the comment cards (i.e. the highly likely to recommend ITA and were your objectives met questions), will be disseminated to the Office of Management and Budget, Congress and the American public as part of CSs Government Performance and Results Act (GPRA) metrics.

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.

ITA will use multiple data collection methods such as web-enabled surveys sent via email, telephone interviews, and in-person surveys via mobile devices/laptops/tablets at trade events/shows to enable clients to conveniently respond to requests for feedback; and a forecast of burden hours.

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 Question 2

There is no duplication of information within the DOC or another government entity. The information collected represents unique client feedback that is required by the CS to efficiently and effectively assess the service provided to U.S. exporters.

ITA maintains a Comment Card system and uses Qualtrics for its survey needs. Client information is stored in Comment Card and Qualtrics database and ITA staff can check to see whether they were sent a survey thereby eliminating duplication of resending the same survey.

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

This information collection involves small businesses. ITA only asks questions that are pertinent to assessing the service provided and minimal information will be collected to provide the best client feedback. Moreover, the majority of these forms have been in use by ITA for several years and during this time we have not received any negative feedback from either clients or client-facing staff regarding the use of these surveys.

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.

If the collection is not conducted or is conducted less frequently, the quality of service that ITA provides to private sector clients may drastically decrease and we may be hindered in meeting our customer's specific needs and requirements. Also, if approval is not granted for use of these documents, the CS's ability to conduct its congressional mandate of broadening and deepening the export base may not be met.

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

This collection will be conducted in a manner consistent with OMB guidelines.

8. If applicable, provide a copy and identify the date and page number of publications 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.

The Federal Register Notice (FRN) soliciting public comment was published on July 6, 2021 (Volume 86, page 35475), **and that announcement did not generate any comments from the public.**

ITA staff consults with respondents and clients to determine areas where improvements to the application, form, questionnaire, or survey and its process can be made. ITA also provides opportunities in its applications, forms, questionnaires, and surveys for respondents to provide their feedback on how to improve the application, form, questionnaire, or survey.

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

Respondents will not receive payments or gifts.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

All responses to this collection of information will be provided confidentiality to the extent allowed by law. This assurance will be printed at the bottom of each form.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or 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 about the client's ethnicity, disability, and sex will be asked and obtained in this information collection. As a result of President Biden's [Executive Order \(EO\) On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government](#), ITA is looking to capture information pertaining to the "underserved community."

Per the EO, "'underserved communities' refers to populations sharing a particular characteristic, as well as geographic communities, that have been systematically denied a full opportunity to participate in aspects of economic, social, and civic life."; including:

1. minority-owned businesses ;
2. "persons who live in rural areas" or rural U.S. businesses;
3. "persons otherwise adversely affected by persistent poverty or inequality" (such women-owned businesses); and
4. members of religious minorities; lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons; and persons with disabilities.

Therefore, in order to better understand and serve the "underserved community," ITA will need to capture this information from its clients.

ITA will also ensure that it will adhere to the guidance found in OMB's [Standards for the Classification of Federal Data on Race and Ethnicity](#).

12. Provide estimates of the hour burden of the collection of information.

ITA estimates that there will be 50,000 respondents. The average time to complete a survey is 30 minutes so the total annual burden hours will be 25,000.

Estimated Respondent Burden Hours

Information Collection Instrument (i.e., Type of Response)	Type of Respondent / Occupational Title	Number of Respondents (a)	Number of Responses Per Respondent (b)	Total Number of Responses (c) = (a) x (b)	Burden Hours Per Response (d)	Total Burden Hours (e) = (c) x (d)
Combined Customer Survey Questions	Business or other for-profit organizations; Not-for-profit institutions;	50,000	1	50,000	.5	25,000
Total						25,000

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 already reflected on the burden worksheet).

Based on the following customer makeup of CS's client population shown below, and median salary data taken from glassdoor.com, CS estimates that the total annual to our respondents will be \$754,651 (estimated total burden time is 25,000 hours).

Respondent Occupation	% of Client Pop.	Median Salary	Hourly Rate	Weighted Avg. Rate
Executive	27%	\$102,690.00	\$49.37	\$13.55
International Business Development	25%	\$52,649.00	\$25.31	\$6.43
Sales	20%	\$24,809.00	\$11.93	\$2.39
Customer Service	9%	\$31,493.00	\$15.14	\$1.33
Government Relations	7%	\$79,168.00	\$38.06	\$2.60
Export Logistics	6%	\$50,612.00	\$24.33	\$1.43
Policy Director	3%	\$78,029.00	\$37.51	\$1.16
External Consultant/Legal Representative	1%	\$78,120.00	\$37.56	\$0.52

In-house Legal Counsel	1%	\$143,307.00	\$68.90	\$0.78
Other	8%	\$59,039.00	\$28.38	\$2.21
Weighted Avg. Hourly Rate				\$30.19
			x 25,000 hours	\$754,651.33

14. Provide estimates of annualized cost 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.

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

It will take ITA staff approximately 5 minutes to review each response and the total burden hours to review 50,000 responses will total 4,166 hours.

$$4,166 \text{ hours} \times \$25/\text{hour staff time} = \$104,166.67$$

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

There are no changes to the information collection since the last OMB approval

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.

Not applicable.

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.

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

The agency certifies compliance with [5 CFR 1320.9](#) and the related provisions of [5 CFR 1320.8\(b\)\(3\)](#).

SUPPORTING STATEMENT PART B - (Questions and guidance for Responses)

Agencies are instructed to complete Supporting Statement Part B if they are using statistical methods, such as sampling, imputation, or other statistical estimation techniques; most

research collections or program evaluations should also complete Part B. If an agency is planning to conduct a sample survey as part of its information collection, Part B of the ICR supporting statement must be completed, and an agency should also complete relevant portions of Part B when conducting a census survey (collections that are sent to the entire universe or population under study). For example, an agency doing a census of a small, well-defined population may not need to describe sampling procedures requested in Part B, but it should address what pretesting has taken place, what its data collection procedures are, how it will maximize response rates, and how it will deal with missing unit and item data.

Agencies conducting qualitative research studies or program evaluations, including case studies or focus groups, should also complete the relevant sections of Part B to provide a more complete description of the use of the information and the methods for collecting the information.

B. Collections of Information Employing Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Question 17 in ROCIS is checked "Yes", responses to the following questions should be included in the Supporting Statement to the extent that it applies to the methods proposed. If there are no statistical methods involved, a response stating this should be provided.

1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

All clients who have received assistance from ITA will have the opportunity to fill out a transactional survey (i.e. comment card). The transactional comment card survey is not mandatory or predicated on receiving ITA assistance. The estimated number of clients that will have the opportunity to fill out a transaction comment card survey will be 30,000. Moreover, the estimated potential respondent universe will be around 6,300 based on a historic average response rate of 21 percent. Please see the table below for respondent universe and historic response rates.

Fiscal Year	Surveys Sent	Responses	Percentage
2020	57,541	5,519	10%
2019	15,349	2,399	16%
2018	17,026	2,919	17%
2017	12,277	2,760	22%
2016	10,826	2,218	20%
2015	10,655	2,512	24%
2014	6,030	1,462	24%
2013	5,062	1,528	30%
2012	6,904	1,427	21%
2011	9,107	2,108	23%

2010	20,187	4,758	24%
2009	19,190	4,486	23%
2008	10,878	2,551	23%

In addition, clients will be randomly selected to receive an annual survey. The sampling methodology will be explained in further detail in question 2 below. The annual survey is also voluntary and sent to an average of 17,583 clients. The average response rate is 14 percent, based on previous years' annual survey results. Please see the table below for respondent universe and historic response rates.

Fiscal Year	Surveys Sent	Responses	Percentage
2020	26,619	2,459	9%
2019	27,787	2,279	8%
2018	16,110	1,119	7%
2017	12,338	1,646	13%
2016	15,029	4,057	27%
2015	7,616	1,263	17%%

2. Describe the procedures for the collection of information including:

Only those selected to receive the annual survey will consist of a sample selection. Clients that have received ITA assistance during the fiscal year will be selected to receive the annual survey. The sampling frame will use a random sample at the overall organizational level and then use a stratified, random sample plan that takes into account the relevant components of its clients such as industry, size of business (perhaps number of employees or revenues), and/or geographic location. To provide a simple example, please see Table 1 (page 9). Assume that the relevant components are industry and size. Further, assume that there are four industries and two sizes of business per industry. ITA will need to know what the proportions of these four industries and two business sizes are across its sampling frame. For purposed of this example, assume that Industry 1 represents 50% of the client base and Industries 2, 3, and 4 represent 25%, 15% and 10%, respectively.

Perhaps another relevant indicator of interest may be the size of the business or organization. Size could be an indication of the number of employees a client has, or it could be total revenues, assuming clients are willing to report the number or it is publicly available. ITA will need to know the distribution of business sizes by industry – or if it chooses other variables to segment its clients. For purposes of this simplified example, assume the distribution is as shown in Table 1.

The extent to which ITA will be in a position to enhance the accuracy of the estimates depends on the selection of the segments it defines. Serious consideration needs to be given to a geographic component in the segmentation scheme since ITA manages its accounts and cases from geographically dispersed locations. Externalities unique to geographic areas may have an effect on accounts/cases and should be taken into consideration. In addition, having data elements such as the congressional district identified and associated with each account will facilitate decisions about how to respond to requests for results at the congressional district level.

The sample pool will be randomly selected and stratified using the following parameters: industry, size of business (number of employees or revenues), and geographic location. Each parameter will have

equal weight and be proportional to the overall sample population. Additionally, the sampling procedure will adjust for over sampling to ensure that the appropriate segments (industry, business size and geographic location) are statistically represented in the respondent sample size. The annual survey will conclude once the sample size is statistically valid at the 95 percent confidence level.

All other surveys will not be using any sampling procedures and ITA hopes to achieve a 14 percent response rate, which is in line with its historic averages. ITA will be taking the following steps to improve its response rates: reducing the length of the Comment Card and ensuring that all other surveys are as short as possible, revising the content of the messages that will contain the survey links, changing the subject line and sending a pre-survey message prior to the survey being distributed.

3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

ITA will be committed to employing the following best practices to increase response rates:

- Letting clients know that ITA will be soliciting their feedback at the beginning of a “case” because ITA values their perspective to inform its continuous improvement efforts.
- Engaging the client in determining an appropriate timeframe for capturing their feedback after a meaningful service has been delivered.
- Facilitating the client providing the feedback via a method of their choice – for example, via telephone interview, or email invitation to take a web survey.
- Providing pre-notification that a customer feedback survey is coming – this can be via a phone call (if the client has indicated a preference for doing the telephone interview) and/or via an advance email letting the client know when to expect the invitation and what the SUBJECT of the email will be and what FROM address will be indicated. (In the private sector, this pre-notification has been shown to be effective when it comes from a known or trusted source.)
- Ensuring that the ‘invitation’ language explains why ITA is conducting the survey, why it is important the selected client participate in the survey, how it intends to use the data collected and when the aggregated results will be shared.
- Sending reminders to encourage the client to participate.
- Sharing the aggregated results with all clients – for example, the results can be shared periodically on a website or via an email.
- Communicating changes/improvements that are being made in response to customer feedback surveys.

For the annual survey, the sampling procedure will adjust for over sampling in order to yield "reliable" data that can be generalized to the universe studied. That is, ITA will continue to send additional surveys from its sample pool until the appropriate response rate is attained to be statistically valid at the 95 percent confidence level for the universe studied.

ITA will conduct an analysis of nonresponse bias for the survey and for each important question on the survey. If significant bias is identified, ITA will propose changes to the survey to accommodate

this bias and/or correct the results in a systematic manner. However, ITA has not observed any bias in its survey responses and has not conducted a nonresponse bias analysis for this survey. ITA will conduct this analysis as soon as it's warranted.

4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

A cross-tabulation and regression analysis will be employed for the annual survey results only. The purpose of this test is to determine drivers of customer satisfaction and will be for internal use only. More specifically, ITA will quantitatively test the questionnaire itself in terms of:

- gaining insight into whether there are apparent relationships between/among satisfaction/use again/recommend questions and the needs and impact questions
- the effectiveness of trying to capture all three types of data (satisfaction/use again/recommend, needs and impact) in one survey questionnaire
- utility of individual questions,
- understanding if there are topics that customers think should be included that were not in the pilot questionnaire
- obtaining feedback from respondents about the questionnaire experience itself
- gaining understanding about the willingness/ability of respondents to report on impact results

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

Individuals who will be or have been consulting on the statistical aspects of the design of the advocacy user satisfaction survey, as well as those individuals who will actually collect and/or analyze the information, are:

Joe Carter, International Trade Administration, U.S. Department of Commerce: (303) 844-5656

John Seo, International Trade Administration, U.S. Department of Commerce: (202) 809-5977

LEGAL AUTHORITY: PUBLIC LAW 15 U.S.C. et seq and 15 U.S.C. 171 et seq

Table 1

(NOTE: All data are for illustrative purposes only)

	Industry 1		Industry 2		Industry 3		Industry 4		
Proportion of All Clients (A)	50%		25%		15%		10%		
Business Size	% Large	% Small	% Large	% Small	% Large	% Small	% Large	% Small	
Proportion within the Industry (B)	90	10	80	20	13	87	8	92	
Proportion for Stratified, Random Sample (C)	45.00%	5.00%	20.00%	5.00%	1.95%	13.05%	0.80%	9.20%	
Proportion of Respondents Reporting Increased Revenues (D)	35.00%	30.00%	40.00%	52.00%	32.00%	18.00%	22.00%	17.00%	
Total Amt of Increased Revenues Reported (E)	\$110,000,000	\$20,000,000	\$15,000,000	\$8,000,000	\$75,000,000	\$25,000,000	\$8,817,000	\$27,000,451	\$288,817,451
Total Respondents Reporting Revenue Increases (F)	20	30	19	31	18	32	17	37	204
Average Amt of Increased Revenues for this Segment (G)	\$5,500,000	\$666,667	\$789,474	\$258,065	\$4,166,667	\$781,250	\$518,647	\$729,742	
Total Number of Clients for this Segment or "Cell" (H)	4500	500	2000	500	195	1305	80	920	(S) 10,000
Total Number to Apply Avg to (J)	1575	150	800	260	62	235	18	156	
Total Estimated Revenue Increased for Segment (K)	\$8,662,500,000	\$100,000,000	\$631,578,947	\$67,096,774	\$260,000,000	\$183,515,625	\$9,128,188	\$114,131,636	\$10,027,951,171

Calculations in support of Table 1

Total number of clients in sampling frame x proportion industry is of total sampling frame x proportion business size is of the industry = number of clients in that segment ($S \times A \times B = H$)

Total amount of Increased Revenue (or number of Jobs Created or number of Jobs Safeguarded) reported / number of respondents reporting Increased Revenue (or Jobs Created or Jobs Safeguarded) = average Increased Revenue (or Jobs Created or Jobs Safeguarded) among those reporting Increased Revenue (or Jobs Created reported or Jobs Safeguarded reported) ($E/F=G$)

Total number of clients for the segment x proportion of reporting Increased Revenues (or Jobs Created or Jobs Safeguarded) = total number to apply the average amount of Increased Revenue (or Jobs Created or Jobs Safeguarded) to ($H \times D = J$)

Average amount of Increased Revenues for this segment (or Jobs Created or Jobs Safeguarded) x total number to apply the average to = total estimated Increased Revenue (or Jobs Created or Jobs Safeguarded) ($G \times J = K$)

Once the total estimated Increased Revenues (or Jobs Created or Jobs Safeguarded) are determined for each segment (or cell), sum those to have Total Estimated Revenue Increased (or Jobs Created or Jobs Safeguarded)