

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

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.

The purpose of this request of Paperwork Reduction Act (PRA) clearance is to allow the Department of Commerce (DOC), as represented by the International Trade Administration's (ITA) Special American Business Internship Training Program (SABIT) to collect voluntary information from foreign nationals who want to participate or who have participated in the SABIT Program. The DOC previously requested and obtained approval of this information collection (OMB Control No 0625-0225 and now seeks renewal of this information collection. This information collection effort is an integral component of ITA's SABIT Program which is, designed to provide U.S.-based, hands-on technical training to executives from various parts of the world as well as virtual training as applicable. SABIT supports the economic transition of Eurasia (the former Soviet Union) and economic growth in other regions of the world, including, South Asia, Greenland, 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.

Originally called the Soviet American Business Internship Training Program, 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.

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 also has follow on activities in the countries in which it works, providing training in cross-cutting sectors, such as marketing and branding. Since fall 2020, SABIT has also started to provide online training.

SABIT utilizes the Program Application Exit Questionnaire, and Alumni Success Form (ITA-4143P-3), to select the most qualified intern candidates and host companies, as well as measure the effectiveness of the SABIT Program and implement changes when needed. Without the Application, SABIT will not be able to assess the qualifications of the candidates. Without the program Exit Questionnaire and Alumni Success Form, SABIT will not be able to gather the information needed to report to the State Department and Congress as required by the Foreign Aid Transparency and Accountability Act of 2016 (FATAA). SABIT also uses the Alumni Success Form to gather up-to-date contact information for future correspondence.

Revision: The SABIT Program has slightly revised the forms. 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 instructions. 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. 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.

The information collected by the SABIT Application for participation in the SABIT Group Program, which includes contact information as well as information about job position, experience, and goals, is used by ITA staff to determine the quality of applicants for SABIT's programs and create delegations of professionals from Eurasia and other regions, including Greenland and South Asia. The program Exit Questionnaire will be used to improve the program by determining what worked and what did not work. This information includes questions directly related to the Monitoring and Evaluation process mandated by the FATAA. The Alumni Success Form will be used to track SABIT alumni to determine how well the program is meeting its foreign policy objectives. This will also be used to improve the program and for the FATAA reports.

The information gathered will be used almost daily. The information collected will not be disseminated to the public, except in an aggregated form. The information may be shared with the State Department, Commerce Department, and directly or indirectly with the U.S. Congress.

This information will be gathered, on a voluntary basis, from foreign nationals—either persons applying to participate in the program (Program Application) or those who have already participated (Exit Questionnaire or Alumni Success Form).

The information will be gathered in a written format (fillable .pdf forms, electronically through our website), or over the phone.

This information will be used for:

- Determining the qualification of candidates who want to participate in U.S.-based programs.
- Determining the qualifications of candidates who want to participate in webinars.
- Determining the usefulness of the U.S.-based programs and the webinars.
- Updating contact information for SABIT alumni.
- Gathering information for success stories (such as U.S. exports, other successes as listed in SABIT's Monitoring and Evaluation plan)
- Gathering information about upcoming programs.

Respondents filling out the program Application must fill it out (electronically) and email it to the SABIT Program. There is no other way for the respondent to apply at this time. The Exit Questionnaire is filled out electronically, although if necessary, a paper form can be provided for the program alumni. The Alumni Success Form can be filled out electronically, but is most often used to write down information gathered by phone.

Information will be gathered on an as needed basis. Program Applications are provided a couple of months before each program is scheduled to come to the United States. Exit Questionnaires are gathered after each program (approximately 15 per year). Alumni Success Forms are gathered on a near daily basis. All are voluntary.

Information gathered in the Program application will be shared with Commerce employees as needed for

evaluations, interviews, and security reasons. Information in the Exit Questionnaire and the Alumni Success Forms will be shared with Commerce leaders, State Department, and Congress, directly and indirectly.

This is an ongoing collection and collection requirements have changed as program reporting requirements have changed. Information is now gathered electronically, and alumni success stories are collected on a more regular basis.

SABIT: Information Requirements and Needs and Uses of Information Collected

Item #	Requirement	Statute	Regulation	Form #	Needs and Uses
1	SABIT Program Application			ITA-4143P-3	Used by the program to evaluate the qualifications of candidates for the SABIT
Item #	Requirement	Statute	Regulation	Form #	Needs and Uses
2	SABIT Exit Questionnaire		FATAA	ITA-4143P-3	Used by the program to determine how well the program met its goals following the program
Item #	Requirement	Statute	Regulation	Form #	Needs and Uses
3	SABIT Alumni Success Form		FATAA	ITA-4143P-3	Used by the program to determine long term outcomes

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 SABIT Program collects information via fillable .pdf forms that are either downloaded from the website or are emailed to participant. The program is currently working to provide the forms via web-based forms.

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.

The information is only applicable to the SABIT Program and the information gathered is not duplicated elsewhere.

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

The information gathering does not impact small businesses or small entities adversely. All information gathered is voluntary.

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.

The SABIT Program must gather information in order to find candidates for the U.S.-based programs and webinars it implements. Without candidates there is no program. The information gathered in the Exit and Alumni surveys are necessary for reporting to State Department (funders) and Commerce Department (managers) as required under the FATAA. Reporting to Congress is often done directly as well as indirectly (via State Department), and the information gathered is required for such reporting.

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;** No information is required and respondents (program alumni) will not be contacted more than quarterly unless they request it.
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;** No information is required, though we may request program participants to fill out the Exit Questionnaire within 48 hours, before they leave the United States.
- **requiring respondents to submit more than an original and two copies of any document;** Respondents are not required to submit any information and all information is gathered electronically or over the telephone.
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;** SABIT does not require information such as this. No SABIT documents are required to be retained by the respondent.
- **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;** SABIT Applications and Questionnaires are gathered to obtain information that is both used to evaluate individuals and to evaluate the program as a whole, from their responses.
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;** SABIT does not require 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** SABIT's privacy policy is the same as the Department of Commerce's privacy policy.
- **requiring respondents to submit proprietary trade secret, 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.** SABIT does not require respondents to submit proprietary trade secrets or other confidential information.

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.

A 60-day request for comments from the public was announced in the Federal Register on

Monday, November 23, 2020 (pg. 74672, Volume 85, Number 226). No comments regarding information collection were received.

Information must be gathered from SABIT program alumni in order to meet the requirements of FATAA.

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

No payments or gifts are provided to the respondents.

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.

The only PII gathered is found in the Participant Application form which is only required if the person wishes to be considered an applicant for the program. The PII requested is date of birth and passport number so that candidates can be vetted, including putting their names and companies through the Office of Foreign Assets Control sanctions lists. DOB and passport information are also needed for Foreign National Visitor forms required by the Department of Commerce. Storage of this information is in government computer systems.

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.

Sensitive information, such as race/ethnicity, disability, and other private issues are not required. Information about health limitations (diet, mobility) is asked in the participant application in order to arrange for accommodation, if necessary.

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

- **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 ‘Annual Cost to Federal Government’.**

In 2018 SABIT received 1,951 applications from Eurasian program candidates and approximately 45 from Sri Lanka. This is the number of applications expected when implementing up to 15 U.S.-based programs in a year.

Based on reports from past program participants, it takes about 3 hours to fill in the Application, which includes information about the applicant's education and experience as well as questions designed to elicit the applicant's goals for the program. For the Exit Questionnaire, the Program asks questions about each company visit as well as information that is gathered for Congressionally mandated monitoring and evaluation reporting. Based on respondents' comments, this information gathering takes approximately one hour. In 2018 SABIT had approximately 200 participants and this year and years following we expect 400 participants, based on the addition of webinars throughout the year. The Alumni Success Form is sometimes filled out electronically and sometimes is filled in by program coordinators who interview the alumnus/a by telephone. Both filling it out and/or being interviewed takes no longer than an hour.

Estimated Annualized Respondent Burden Hours

Information Collection Instrument	Type of Respondent (e.g., Occupational Title)	# of Respondents (a)	Number of Responses Per Respondent (b)	Total # of Annual Responses (c) = (a) x	Burden Hours/Response (d)	Total Annual Burden Hours (e) = (c) x (d)
Program Application ITA-4143P-3	Mid- to Senior Level Professional (Foreign National)	1,750	1	1,750	3	5250
Exit Questionnaire ITA-4143P-3	Program Participant (Foreign National)	650	1	650	1	650
Alumni Survey ITA-4143P-3	Program alumnus/a (Foreign National)	1,100	1	1,100	1	1100
Totals				3,500		7,000

Estimated Annualize Respondent Costs (Theoretical Cost of Respondent Time)

Type of Respondent/ Occupational Title	Number of Respondents	Number of Responses per Respondent	Average Burden per Response	Hourly Wage Rate*	Total Burden Costs
Mid- to Senior Level Professional (Foreign National)	1,750	1	3 Hrs	\$15	\$90,000

Mid- to Senior Level Professional (Foreign National)	1,750	1	1	\$15	\$26,250
Total	--	-	--	--	\$116,250

***Average Russian Executive Salary per salaryexporer.com is \$1,857 per month, which is approximately \$15 per hour. Salaries in Russia often will be higher than salaries in other countries in Eurasia, such as Tajikistan. We are using \$15 per hour as an average for the professionals that come to the United States.**

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).

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

Estimated Recordkeeping Burden*

Activity/CFR Section	Type of Respondent/ Occupational Title	Number of Recordkeepers (a)	Number of Records per Recordkeeper (b)	Total Annual Records (c) = (a) x (b)	Average Burden per Recordkeeper (d)	Total Annual Recordkeeping Burden Hours (e) = (c) x (d)
Updating forms with Program-specific information(industry/dates)/ analyzing, evaluating, summarizing, and/or reporting on the collected information/reading applications	Senior International Trade Specialist	1	1,750	1,750	.10 hour	175

Formatting forms/analyzing, evaluating, summarizing, and/or reporting on the collected information/reading applications	International Trade Specialist	1	1,750	1,750	.10 hour	175
Accept and file documents/forms	FSN	2	3,500	7,000	.10 hour	700
Updating forms with Program-specific information(industry/dates)/analyzing, evaluating, summarizing, and/or reporting on the collected information/reading applications	Program Director/Supervisory International Trade Specialist	1	1,750	1,750	.10 hour	175
Updating forms with Program-specific information (industry/dates)/analyzing, evaluating, summarizing,	Program Deputy Director & Program Analyst	1	1,750	1,750	.10 hour	175
Totals						1,400

***There are no capital costs or operating and maintenance costs associated with this information collection.**

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.

SABIT staff read every document, often multiple times. However, the estimated cost is below. Each person

may review the same document as another staff member, so the numbers add up to more than the 3,500 total documents. This is necessary to review qualifications as well as to analyze data from the alumni forms.

SABIT Program – Annualized Costs to the Federal Government

Staff	Salary/ Hour	Hours	Total Annualized Cost to Gov't
Federal Oversight			
GS 14/9 -	74.37	175	13,014.75
GS 14/7	70.45	175	12,328.75
GS 13/6	52.99	175	9,273.25
GS 9/1	28.91	175	5,059.25
FSN Kyiv	12.37	350	4,329.50
FSN Almaty	12.37	350	4,329.50
Total Cost to the Government			\$48,335

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

There are no material changes to the information collection since the last OMB approval. However, the number of estimated respondents to the Alumni Success Form increased by 500.

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.

All data will be analyzed to meet the requirements of FATAA and State Department requirements for the funding used for these programs. This is an ongoing project. Data is requested by State Department, Commerce Department and the Congress periodically and at least once per year.

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.

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

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

Not applicable. The agency certifies compliance with 5 CFR 1320.9 and the related provisions of 5 CFR 1320.8(b)(3).

B. Collections of Information Employing Statistical Methods

This collection does not employ statistical methods.