

Supporting Statement
“SelectUSA Investment Promotion Client Intake Questions”
U.S. Department of Commerce
International Trade Administration
OMB Control No. 06XX-XXXX

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.**

Executive Order 12862 directs Federal agencies to provide service to the public that matches or exceeds the best service available in the private sector. In order to work continuously to ensure that our programs are effective and meet our customers' specific needs, U.S. Department of Commerce (hereafter “the Agency”) seeks to obtain OMB approval of a generic clearance to collect qualitative input soliciting customer interest in the Agency's services. By qualitative input we mean information that provides useful insights on perceptions and opinions but are not statistical surveys that yield quantitative results that can be generalized to the population of study.

This collection of information is necessary to enable the Agency to garner customer and stakeholder input in an efficient, timely manner, in accordance with our commitment to improving service delivery. The information collected from our customers and stakeholders will help ensure that users have an effective, efficient, and satisfying experience with the Agency's programs. This input will provide insights into customer or stakeholder needs and expectations, provide an early warning of issues with service, or focus attention on areas where communication, training or changes in operations might improve delivery of products or services. These collections will allow for ongoing, collaborative, and actionable communications between the Agency and its customers and stakeholders. It will also allow feedback to contribute directly to the improvement of program management.

- 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.**

Providing high quality, efficient agency programs requires direct input from customers and stakeholders to ensure they are receiving information most valuable to their needs. The agency will collect, analyze, and interpret information gathered through this generic clearance to identify specific customer needs to provide tailored service delivery based on the results. The solicitation of input will target areas such as objectives, goals, and outcomes of the requested services. Responses will be assessed to plan and inform the service delivery to ensure a high quality of service offered to the public. If this information is not collected, vital input from customers and stakeholders on the Agency's services will be unavailable.

The Agency will only submit a collection for approval under this generic clearance if it meets the following conditions:

- Information gathered will be used only internally for general service improvement and program management purposes and is not intended for release outside of the agency (if released, procedures outlined in Question 16 will be followed).
- Information gathered will not be used for the purpose of substantially informing influential policy decisions ¹;
- Information gathered will yield qualitative information; the collections will not be designed or expected to yield statistically reliable results or used as though the results are generalizable to the population of study.
- The collections are voluntary.
- The collections are low-burden for respondents (based on considerations of total burden hours, total number of respondents, or burden-hours per respondent) and are low-cost for both the respondents and the Federal Government.
- The collections are non-controversial and do not raise issues of concern to other Federal agencies.
- Any collection is targeted to the solicitation of opinions from respondents who have experience with the program or may have experience with the program in the near future; and
- With the exception of information needed to provide remuneration for participants of focus groups and cognitive laboratory studies, personally identifiable information (PII) is collected only to the extent necessary and is not retained.

If these conditions are not met, the Agency will submit an information collection request to OMB for approval through the normal PRA process.

To obtain approval for a collection that meets the conditions of this generic clearance, a standardized form will be submitted to OMB along with supporting documentation (e.g., a copy of the comment card). The submission will have automatic approval unless OMB identifies issues within 5 business days.

The types of collections that this generic clearance covers include, but are not limited to:

- Customer comment cards/complaint forms
- One-on-one discussion with stakeholders
- Cognitive laboratory studies, such as those used to refine questions or assess usability of a website.
- Qualitative customer intake questionnaires (e.g., pre-transaction questionnaires; opt-in web surveys)
- In-person observation testing (e.g., website or software usability tests)

¹ As defined in OMB and agency Information Quality Guidelines, “influential” means that “an agency can reasonably determine that dissemination of the information will have or does have a clear and substantial impact on important public policies or important private sector decisions.”

The Agency has established a managing entity to serve for this generic clearance and will conduct an independent review of each information collection to ensure compliance with the terms of this clearance prior to submitting each collection to OMB.

- 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.**

If appropriate, agencies will collect information electronically and/or use online collaboration tools to reduce burden.

- 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**

No similar data are gathered or maintained by the Agency or are available from other sources known to the Agency.

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

Small business or other small entities may be involved in these efforts but the Agency will minimize the burden on them of information collections approved under this clearance by sampling, asking for readily available information, and using short, easy-to-complete information collection instruments.

- 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.**

Without these types of feedback, the Agency will not have timely information to focus its services to meet customer needs.

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

There are no special circumstances. The information collected will be voluntary and will not be used for statistical purposes.

- 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.**

In accordance with 5 CFR 1320.8(d), on April 28, 2023 (Vol. 88, pg. 26273) a 60-day notice for public comment was published in the *Federal Register*. No comments were received. A 30-day notice for public comment that was published on July 1, 2023 (Vol. 88, pgs. 42680).

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

The Agency will not provide payment or other forms of remuneration to respondents of its various forms of collecting feedback. Focus groups and cognitive laboratory studies are the exceptions.

In the case of in-person cognitive laboratory and usability studies, the Agency may provide stipends of up to \$40. In the case of in-person focus groups, the Agency may provide stipends of up to \$75. If respondents participate in these kinds of studies remotely, via phone, or Internet, any proposed stipend needs to be justified to OMB and must be considerably less than that provided to respondents in in-person studies, who have to travel to the agency or other facility to participate. If such information collections include hard-to-reach groups and the agency plans to offer non-standard stipends, the Agency will provide OMB with additional justifications in the request for clearance of these specific activities.

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.

If a confidentiality pledge is deemed useful and feasible, the Agency will only include a pledge of confidentiality that is supported by authority established in statute or regulation, that is supported by disclosure and data security policies that are consistent with the pledge, and that does not unnecessarily impede sharing of data with other agencies for compatible confidential use. If the agency includes a pledge of confidentiality, it will include a citation for the statute or regulation supporting the pledge.

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.

No questions will be asked that are of a personal or sensitive nature.

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

A single platform will be used to collect information from respondents. The annual burden hours requested are based on the number of collections we expect to conduct over the requested period for this clearance.

Estimated Annual Reporting Burden				
Type of Collection	No. of Respondents	Annual Frequency per Response	Average Burden Hours per Response	Total Hours
Client Intake Form	200	1	30 mins	100
TOTALS (THREE-YEAR PERIOD)	200 (600)			100 (300)

The estimated annualized cost to the respondents is **\$50,000**. The estimated annual respondent costs are based on the number of estimated hours for the collections we expect to conduct over the requested period for this clearance.

Estimated Annual Respondent Costs				
Form Name	Type of Respondents	Total Annual Burden Hours	Hourly Respondent Wage Rate*	Respondent Cost
Customer Satisfaction Surveys	Individuals	100	\$50	\$5,000
Total		100		\$5,000

The wage rate, \$24.98, was calculated using the Bureau of Labor statistics occupation title "All Occupations", occupation code "00-0000", http://www.bls.gov/oes/current/oes_nat.htm#00-0000.

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).

No additional costs are anticipated.

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.

The estimated cost to the Federal Government for annual oversight is approximately \$6,672.

Staff	Grade/Step	Salary**	Fringe (if		Total
-------	------------	----------	------------	--	-------

			applicable	% of Effort	Annualized Cost to Gov't
Federal Oversight					
DOC Program Staff	GS14-04	133,447		5%	\$6,672

**The Salary in the table above is cited from: Office of Personnel Management

<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DCB.pdf>.

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

There are no changes to the information collection since this is the first request for 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.

Feedback collected under this generic clearance provides useful information, but it does not yield data that can be generalized to the overall population. Findings will be used for general service improvement but are not for publication or other public release.

Although the Agency does not intend to publish its findings, the Agency may receive requests to release the information (e.g., congressional inquiry, Freedom of Information Act requests). The Agency will disseminate the findings when appropriate, strictly following the Agency's "Guidelines for Ensuring the Quality of Information Disseminated to the Public." and will include specific discussion of the limitation of the qualitative results discussed above.

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."

The Agency certifies compliance with the requirements in 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

Not applicable.