

SUPPORTING STATEMENT
U.S. Department of Commerce
National Institute of Standards and Technology (NIST)
Manufacturing Extension Partnership (MEP) Client Impact Survey
OMB Control No. 0693-0021

SUPPORTING STATEMENT PART A

Abstract

This includes narrative information explaining the purpose, scope, and benefit(s) of this data collection request. Suggested word length limit - 250 words only.

The Manufacturing Extension Partnership (MEP) is a national network of locally based manufacturing extension centers that assist small-and medium-sized manufacturers to improve their productivity, improve profitability, and enhance their economic competitiveness. The information collected will provide the MEP with information regarding MEP Center performance regarding the delivery of technology, and business solutions to U.S.-based manufacturers. The collected information will assist in determining the performance of the MEP Centers at both local and national levels, provide information critical to monitoring and reporting on MEP programmatic performance and assist management in policy decisions.

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.

Sponsored by the National Institute of Standards and Technology (NIST), the Manufacturing Extension Partnership (MEP) is a national network of locally based manufacturing extension Centers working with small and medium sized manufacturers to assist them and improve their productivity and profitability, and to enhance their economic competitiveness. The information collected will provide the MEP with information regarding MEP Center performance, including the delivery of technology and business solutions to U.S.-based manufacturers.

The information collected will come directly from clients of NIST MEP Centers. This information will include quantified impacts on a client's sales, cost savings, employment, and investment. These figures will be used to determine the effectiveness of the project work done by the Center, and to gauge the overall success of the NIST MEP program. Collection of this data is mission-critical and is used for NIST MEPs Government Performance and Results Act (GPRA) requirements.

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.

Data will be disseminated to the public in aggregate—quantified impacts will be totaled for

NIST MEPs annual impact reports to stakeholders and the general public. Aggregate quantified impacts and other survey findings, such as client challenges, may also be used for the development of blogs and other research to inform NIST MEP and the public on manufacturing.

NIST MEP collects information from Center clients on a quarterly basis, however, each client will only be surveyed once annually.

This information is used for the following purposes:

- Program Accountability
- Analysis and Research
- Reports to Stakeholders
- Continuous Improvement
- Knowledge Sharing
- Identification of Distinctive Practices
- Award Recipient Evaluation

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.

Collection of this information will be done through a web-based survey instrument. Respondents will be sent their login information and a link to the survey via email. The hyperlink included in the email will direct the respondent to the online survey login page and is a secure link. The link in the email will be live and clickable.

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 Item 2 above.

Due to the unique partnership relationship between MEP and the Centers and their clients, comparable data is not collected from manufacturers. Consultation with other offices within the Department of Commerce have been used to gather background information about topics and about previously used approaches to increase knowledge base for the local Centers. As a result, the information to be collected through this system will not duplicate any existing collection efforts.

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

Data collected by this survey is information that will be readily available to those that answer the survey. MEP Centers identify the person at the client site with the most knowledge of the project work completed, and with the best access to the data requested within the survey. MEP Centers take great care to educate survey respondents on the concepts within the survey prior to the survey invitation is sent. MEP Centers also confirm client contact data and perform quality assurance measures to ensure the information goes to the correct person on the first attempt. Respondents will be prepared in advance of the survey and have concepts explained to them by

their local field staff. Questions have been kept to a minimum to decrease the overall burden to owners or employees of small businesses.

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.

Removal of the “Sunset Provisions” (H.R.1274), have made NIST MEP a long-term investor in regional economies with a need to establish the *Center Reporting* system. The data collected will help NIST MEP monitor and evaluate the Centers' participation in the program and to provide Congress with quantitative information that it requires from government-supported programs. These requirements are clearly stated in the MEP program legislation and the GPRA. This data will be collected on a quarterly basis; however, each client will respond only once during the year. The data collected will enable NIST MEP to identify Centers in need of immediate assistance. Less frequent collection of data would result in the unacceptable situation of making significant policy decisions based on obsolete and potentially misleading information. It might also delay the provision of assistance to the Centers.

If the information is not collected, NIST MEP staff will be unable to monitor Center performance and ensure that the MEP program is meeting the goal of “strengthening the global competitiveness of smaller U.S. manufacturers.” Additionally, national stakeholders, including Congress and Federal agencies, use the information to make annual funding decisions regarding the MEP national appropriation. These stakeholders need information on which to base their decisions. Information demonstrating compelling evidence of program effectiveness is a critical component of that decision. The NIST MEP reporting and survey systems are designed to collect this information so that it can be made available to stakeholders. Finally, MEP would be unable to fully comply with the GPRA mandate that all Federal agencies evaluate their programs’ outcomes.

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; requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; requiring respondents to submit more than an original and two copies of any document; requiring respondents to retain records, other than health, medical, government contract; grant-in-aid, or tax records, for more than three years; 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; requiring the use of a 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 requiring respondents to submit proprietary trade secrets, 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.

The proposed collection of information will be conducted in a manner consistent with OMB guidelines.

8. If applicable, provide a copy and identify the date and page number of publication 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. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

A 60 Day Federal Register Notice (FRN) soliciting public comments was published on April 7, 2023, (Vol. 88, Number 67, pages 20860-20861). Professor Andrew Reamer emailed April 9, 2023, requesting a copy of the survey instrument. Professor Reamer was provided the requested copy of the draft survey instrument and supporting statement on April 12, 2023.

A 30 Day Federal Register Notice (FRN) soliciting public comments was published on September 26, 2023 (Vol. 88, Number 185, pages 65952-65953.)

The development of NIST MEP's data collections, including the MEP Client Survey, is the result of extensive collaboration between NIST MEP and the National Network of MEP Centers. Most recently, beginning in September 2022, NIST MEP hosted a Performance Evaluation Working Group, with participation open to representatives from each Center that chose to attend the meetings, which were held monthly. NIST MEP received, through this group, feedback on the survey structure and format as well as the fielding process, with the Centers representing the opinions/interests of their clients, as well as their own, to NIST MEP staff. NIST MEP received input regarding data availability and frequency of the collection from its staff. This group provided their professional opinions and expertise on the survey questions and protocol.

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

There are no payments or gifts to 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.

Data collected will only be used in aggregate. Identifying information will not be shared outside of NIST MEP. Appropriate Privacy Act Statement is provided on the collection instruments and details appropriate SORNs.

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. 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 of a sensitive nature will be asked.

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

It is estimated that 14,500 respondents will complete the survey. It is estimated that the survey will take 12 minutes to complete. The estimated annual burden is 2,900 hours.

14,500 respondents annually x 12 minutes per respondent = 2,900 burden hours

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 costs to the respondents.

14. Provide estimates of annualized costs 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 Items 12, 13, and 14 in a single table.

The cost to collect, review, and analyze the collected information is \$250,000. This is the approximate cost of the current data collection contract held with an independent third-party vendor.

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

No major changes or adjustments have been made to the instrument since OMB approval was received in October 2020. For the sake of improving clarity, based upon feedback received by the NIST MEP National Network of MEP Centers from clients who previously responded to the survey, the word “directly” will be removed from the series of impact questions, i.e., “4. Did the services you received directly lead to an increase in sales at your establishment over the past 12 months?” will become, “Did the services you received lead to an increase in sales at your establishment over the past 12 months?”

The number of estimated potential annual respondents has increased from 13,000 to 14,500 due to increases in the number of clients reported to NIST MEP by the MEP Centers.

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.

The data will be collected for internal review purposes and to monitor the Centers, as well as for reporting to Congress. Reports dealing with the characteristics and performance of the Centers will include trends, benchmarks, statistical tables and charts generated from the database.

Information will be presented in the following methods:

- Reports to Congress
- Promotional/marketing brochures
- Center Reports
- Internal Reports
- Presentations to MEP stakeholders
- Center Reviews

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 OMB Control #, expiration date and public burden statement will be displayed on the collection instrument.

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

There will be no exceptions to the certification statement.