

Supporting Statement A

Specific Instructions

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.

In addition to the requirements of the Government Performance and Results Act (103 P.L. 62; 107 Stat. 285), or GPRA, which requires agencies to report on the outcomes of their activities, the information collection is required in order to respond to administrative requests such as those made by the Office of Management and Budget for USTDA's Annual Budget Presentation). The Foreign Aid Transparency and Accountability Act (P.L. 114-191) or FATAA requires agencies that program foreign assistance to provide performance data. It is also required for preparation of USTDA's Annual Budget Requests, Congressional Presentations and Agency Annual Report. The Foundations for Evidence-Based Policymaking Act (P.L. 115-435) or Evidence Act advances program evaluation as an essential component of evidence building and requires agencies to implement Office of Management and Budget (OMB) guidance for program evaluation. The Information Quality Act (IQA) recognizes that prudent decision making depends on reliable, high-quality data.

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 collection is used to satisfy reporting requirements related to: performance measures under the legislative requirements of GPRA, and the later GPRA Modernization Act, OMB and Congressional Committees; performance and other reporting requirements under FATAA; and use to inform USTDA's Strategic Plans, Annual Reports, Budget Submissions, and Congressional Presentations. The information collection described in this application is designed to provide the necessary data and information to evaluate the performance of the agency on these measures. The information is used by OMB and by Congressional Committees to evaluate the performance of the agency. Specifically, the current collection was used to inform specific reporting requirements such as the Agency's FY2021-2023 Performance and Accountability Reports, the Agency's Congressional Budget Justification and Requests submitted in FY2021-2023, the Agency's Four-Year Strategic Plan, the Agency's reporting requirements under FATAA, and others.

USTDA senior management also uses the data and information for program planning purposes and to make evidence-informed decisions. It is also used as part of agency monitoring and evaluation of its various activities to measure effectiveness and/or efficiency and/or to obtain data for future activity planning. Specific examples of how the Agency has made use of the current collection internally include: the Agency's annual strategic planning process in FY2021-2023, the

Agency's quarterly performance dashboards in FY2021-2023, and the Agency's programmatic decision-making related to specific activities in FY2021-2023.

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 information collection would depend heavily on tailored, project-specific questions conveyed to interviewees by phone or email. Interviewees would be encouraged to respond by phone, videoconference, or email, whichever method reduces the burden to the interviewees and allows them the flexibility to respond when they have time. This increases the likelihood of obtaining high quality information. In addition, interviews by telephone would play an important role when email addresses are not available or when responses to emails are not received. However, we wish to emphasize that USTDA information collection has increasingly utilized IT collection methods, primarily email, in recent years. We believe this has substantially improved the quality and quantity of information collected while at the same time reducing the burden for the stakeholders who supply the information.

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.

(1) Efforts to Identify Duplication - The interview team will analyze their project assignments and, to the extent possible, group projects by region, country, economic sector, and U.S. companies before initiating tailored emails, calls, or in-person interviews. Thus, in many cases, the same email, call, etc. could gather information about a number of different projects and reduce the total number of contacts needed.

(2) Use of Similar, Already Available Information – Evaluators are required to carefully review all previous agency information and records before making contact in order to avoid redundant requests for data as well as to ask the right questions.

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

The agency does not believe that the information collection would have a significant economic impact on a substantial number of small entities. Small businesses and other small entities play an important role as contractors and as beneficiaries of agency activities. The agency generally finds that smaller companies are at least as willing to respond to requests for information as larger companies. Believing that the economic impact of the proposed information collection would not be significant

on small businesses or entities, the agency therefore would treat them and other businesses in the same manner. In addition, there seems no practicable way to obtain the necessary information from small businesses that would involve less burden than it now does. They are given the option for tailored interviews via telephone or video conferencing or via tailored questions via email.

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 information collection is not conducted or is conducted less frequently, the consequence to Federal program or policy activities would be serious, i.e., the agency would not have available the information that is necessary to meet both the legal and the operational requirements as described in paragraphs 1 and 2 (above).

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.

No to all of the above.

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. Specifically address comments received on cost and hour burden. Describe 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. 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.

USTDA published its first Federal Register Notice soliciting comments on the data gathering efforts prior to submission to OMB on November 6, 2023 at 88 FR 76267, at which time USTDA announced a 60-day comment period. The comment period ended January 2, 2024. No comments were received in response to this notice.

USTDA published its second Federal Register Notice regarding the submission to OMB and soliciting comments on the data gathering efforts on January 2, 2024, at 89 FR 120, at which time a 30-day comment period was announced. The comment period will end on February 2, 2024.

USTDA's evaluation staff have consulted with its outside evaluations contractors and other specific stakeholders subject to the information collection to review the agency's information collection efforts and seek advice about how USTDA evaluations efforts and procedures could be improved. As a result, and as referenced in sections below, USTDA has implemented highly coordinated and consolidated outreach to certain stakeholders and has changed how it approaches assigning evaluations to the outside evaluation contractors to further enhance opportunities to consolidate outreach and lessen the response burden on respondents, while simultaneously strengthening the evaluators' ability to provide high-level recommendations and learning opportunities for USTDA based on the representative portfolio.

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

Not applicable.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The information collection by the agency could involve commercially sensitive and proprietary data because a basic goal of the agency activities is to promote the export related interests of U.S. entities. If respondents are willing to share such information, the agency would inform the respondents that the information would be kept confidential by the agency in accordance with and subject to applicable U.S. law (e.g., Freedom of Information Act, and others).

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.

Questions of a sensitive nature are not relevant to agency activities and would not be asked.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- * 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 item 13.

- (a) **Over the last three years, USTDA's Program Monitoring and Evaluation Office has continued to streamline and improve its evaluation process in order to conduct more targeted, tailored outreach to gather specific information from participants. The M&E Office has focused its attention on higher quality assessments, using informed outreach strategies that minimize the burden on respondents. This has yielded a reduction in the number of people contacted per evaluation, as well as a reduction in the number of times each project is evaluated. USTDA's experience over this period shows that it now requires communication (primarily telephone, or email or fax) with approximately 2 individuals per project evaluated externally and approximately 1-2 individuals per project evaluated internally. Information is sought approximately once per year. The information collection effort for this application is for 300-400 agency projects evaluated externally and 200-250 projects evaluated internally per year, for a total of 1,000 to 1,300 respondents annually. We estimate that the average interview takes approximately 20 minutes to obtain the desired information. Thus, we estimate the total burden on the interviewees to be 334 to 434 hours.**
- (b) **The request for approval does not cover more than one form, therefore, separate hour burden estimates and aggregate hour burdens are not necessary.**
- (c) **The interviewees for this project will be highly technical professionals (Engineers, Accountants, etc.) and middle level business executives (Business Development Managers, Managers of International Marketing, etc.). Our experience is that such people bill their time at approximately \$215 per hour. Thus, our total estimate of the total cost/burden of this information collection program is approximately \$72,000 to \$93,000. This is obtained by multiplying the number of hours by the rate of \$215 per hour.**

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 shown in Items 12 and 14).

- * The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and

software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

- * If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- * Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices.

Not applicable. The only cost or burden to the public/interviewees of this project is the time respondents spend responding to agency questions. See Question 12 above. While some respondents would be selected by having participated in activities that may have had, or have had, recordkeeping and reporting requirements, the respondents would not be subjected, under this particular information collection, to additional recordkeeping or reporting requirements.

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. Costs to the Federal government for contracting out or paying parties for information collection activities should be included here.

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

The estimated annualized cost to the federal government of this information collection project is approximately \$402,523. This number is obtained by adding the following:

- **Estimated Cost of Outside Evaluation Contractors to collect the information- \$292,094. USTDA's Program Monitoring and Evaluation Office utilizes two Outside Evaluation Contractors to obtain high quality analysis and reporting, and to promote the adoption of targeted, tailored evaluation strategies that minimize the burden on respondents. The Outside Evaluation Contractors estimate that a total of \$292,094 is spent on information collection activities on an annual basis. The remaining value of these contracts is dedicated to more sophisticated analysis and reporting to fulfill other USTDA requirements that support the use of objectively verified evaluation data to improve program performance.**
- **Estimated USTDA Personnel Costs to Manage and Monitor the Outside Evaluation Contract - \$72,383 (obtained by assuming that the USTDA evaluation team spends about 20% of its time managing and monitoring this contract).**
- **Estimated USTDA Personnel Costs to Conduct Internal Evaluations (evaluations conducted by USTDA personnel, to include contractor staff)-**

\$33,046 (obtained by assuming that the USTDA evaluation team spends about 5% of its time conducting the evaluations and an estimate from the contractor staff of the estimated cost of information collection associated with these evaluations).

- **Estimated Miscellaneous Expenses - \$5,000- Internet, telephone expenses etc.**

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

This is a request for extension of a currently approved information collection with minor changes that reflect improvements to the information gathering process that lessen the public burden while improving the quality of information gathered as well as reflecting inflation and current labor market rates for cost estimates. The agency wants to continue to evaluate the impact of its programs through outside evaluators and in-house staff. This is particularly important as the agency wishes to track specific projects over a period of several years.

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 information collected is shared internally to inform program design and decision-making, to ensure that new investments fully leverage the evidence from past projects. Information from individual information collections is never published to protect the confidentiality of individual respondents. Information from the overall annual assessment is published only in aggregate form for purposes of maintaining public transparency and accountability.

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 Item 19, "Certification for Paperwork Reduction Act Submissions."

Exemptions for c and f are being sought. For c, as indicated in Item 5 above, the agency does not believe that the information collection would have a significant economic impact on a substantial number of small entities. In addition, there seems no practicable way to reduce the burden on them. For f, the information collection does not have recordkeeping requirements and therefore also does not indicate retention periods for the same.