

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

Abstract

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 (SABIT) Program 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 and now seeks renewal. This collection effort is an integral component of ITA's SABIT Program which is designed to provide U.S.-based technical training to executives from various parts of the world as well as virtual training as applicable. SABIT supports economic growth in transitioning countries, spurring discussion and possible partnerships between the SABIT delegates and the U.S. host companies.

The SABIT Program currently conducts two-week, industry-specific training programs in the United States for industry professionals from around the world. 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, such as marketing and branding seminars. SABIT also provides online, virtual training and organizes virtual alumni events.

SABIT has several forms:

- SABIT Program Application to select participants for the two-week, U.S.-based programs;
- SABIT Survey, which encompasses three types: Pre-Program Survey, Post-Program Survey, and Long-Term Survey;
- Alumni Success Form: Used for follow-up surveys

Without the SABIT Program Application, SABIT will not be able to assess the qualifications of the candidates. Without the SABIT Surveys 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).

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.

SABIT uses the SABIT Program Application to aid in the selection of the most qualified participant candidates. The information requested is voluntary and is kept to the most necessary information for the benefit of the applicant.

The participant surveys, which are filled out after being selected for the program (Pre-Program Survey) and after completion (Post- Program Survey). The Long-Term Survey is used for gathering

information to report under the Foreign Aid Transparency and Accountability Act of 2016 (FATAA) as required by the State Department, which provides funding for the program.

See Public Law 114-191, Foreign Aid Transparency and Accountability Act of 2016.

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, 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 Pre-Program Survey is designed to see what the delegates think prior to the program and the Post-Program Survey is designed to compare to the Pre-Program survey to find out if the program was useful and did what it was supposed to do. This information will also 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. Finally, the Long-Term Survey will be used to gather longer-term information on past participants, again, in order to report to the State Department under the FATAA rules.

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 been selected to participate or who have participated (Surveys and Alumni Success Form).

The information will be gathered in a written format (electronically through web platforms), through E-mail, or by 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 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 complete the Application Form and Surveys online. The Alumni Success Form can be filled out electronically but is most often used for Program staff 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. Pre-Program surveys are gathered approximately a week before each program and the Post-Program a week after. Long-Term Surveys are collected a year or more after the program. Alumni Success Forms are gathered on a near daily basis from past participants. 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 Pre- and Post-Program Surveys 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			0625-0225	<ul style="list-style-type: none"> Used by the public to apply to the SABIT Program. Used by the BUREAU to evaluate the qualifications of candidates.
Item #	Requirement	Statute	Regulation	Form #	Needs and Uses
2	SABIT Pre-Program Survey	Public Law 114-191, Foreign Aid Transparency and Accountability Act of 2016		0625-0225	Used by the BUREAU to gather information about understanding before Program
3	SABIT Post-Program Survey	Public Law 114-191, Foreign Aid		0625-0225	Used by the BUREAU to gather information about understanding after Program
4	SABIT Long-Term Survey	Public Law 114-191, Foreign Aid		0625-0225	Used by the BUREAU to gather information about how the information learned on the
5	SABIT Alumni Success Form	Public Law 114-191, Foreign Aid		0625-0225	Used by the BUREAU to gather successes from participating in the program.

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 an electronic platform. For Program Applications, Survey Monkey Apply. Surveys are collected via Survey Monkey. The Alumni Success form is Word form and should be sent and received electronically.

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 three Surveys and Alumni Success Form 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 Pre- and Post-Program Surveys within a week after receiving it.
- **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 Surveys 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 business information on these forms.

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 Tuesday, April 16, 2024 (pg. 26862, Volume 89, Number 74). No comments regarding information collection were received.

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.

No PII is gathered on the forms.

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, but is not required.

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'.**

Estimated Respondent Costs (Theoretical Cost of Respondent Time)

Information Collection Instrument	Type of Respondent (e.g., Occupational Title)	# of Respondents (a)	Annual # of Responses/ Respondent (b)	Total # of Annual Responses (c) = (a) x (b)	Burden Hours/ Response (d)	Total Annual Burden Hours (e) = (c) x (d)
Program Application	Mid- to Senior Level Professional (Foreign National)	2,000	1	2,000	3	6,000
Pre-Program Survey	Program Participant (Foreign National)	150	1	150	.10	15
Post-Program Survey	Program alumnus/a (Foreign National)	150	1	150	.10	15
Long-Term Survey	Program alumnus/a (Foreign National)	500	1	500	1	500
Alumni Success Form	Program alumnus/a (Foreign National)	250	1	250	.5	125
Totals				3050		6655

Estimated Annualized Respondent Costs

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)-Applicant	2,000	1	3 hours	\$15	\$90,000
Mid- to Senior Level Professional (Foreign National)-Alumnus	1050	1	.4	\$15	\$6,300
Total	--	--	--	--	\$96,300

* Average Ukrainian Executive Salary per salaryexporer.com is \$571 per month. Given a higher salary for our applicants, at \$1200 per month, the hourly wage is which is approximately \$15 per hour. 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).

- 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 consider 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.

Estimated Recordkeeping Burden*

Activity/CFR Section	Type of Respondent/ Occupational Title	Number of Record-keepers (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	2	2350	4700	.10 hour	470

Formatting forms/ analyzing, evaluating, summarizing, and/or reporting	International Trade Specialist	4	2350	1,750	.10 hour	700
Accept and file documents/forms	FSN	2	2 3 5 0	7,000	.10 hour	470
Updating forms with Program- specific information(indus- try/dates)/ analyzing, evaluating, summarizing, and/or reporting on the collected information/readi- ng applications	Program Director/ Supervis- ory Internati- onal Trade Specialist	1	2350	2350	.10 hour	235
Totals						1875

***The cost of the online platforms for the Applications and Surveys is approximately \$20,000 per year.**

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 table below represents an updated estimate of the cost of SABIT staff to create, distribute, receive, and analyze the forms for which we are requesting updated approval.

In order to better manage the application and survey process, we have purchased services that allow web-based applications and surveys. That is a new cost for this current request. In the past we used fillable PDFs and email, which had nominal cost. Additionally, it takes more time to format these new forms, though once formatted, it provides an easier and more efficient way to receive and analyze the applications and surveys.

Since the last approval process, SABIT has increased the number of applicants and alumni surveyed. This adds to the cost.

Finally, SABIT has hired two new staff members for the program, which adds to the personnel cost in the table.

SABIT Program – Annualized Costs to the Federal Government

Staff	Salary/ Hour	Hours	Total Annualized Cost to Gov't
Federal Oversight			
GS 14/10	87.12	470	40,946.40
GS 14/9	84.06	235	19,754.10
GS 13/9	73.72	175	12,901.00
GS 12/2	49.28	175	8,624.00
GS 10/1	36.21	175	6,336.75
GS 7/1	26.89	175	4,705.75
FSN Kyiv	15	235	3,525.00
FSN Almaty	15	235	3,525.00
Platform cost			20,000.00
Total Cost to the Government			120,318

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

The SABIT Program has revised the collection instruments. 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 wording. 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.

The surveys provided to the participants (Pre- and Post- Program Survey) have been separated into, as their names indicate, surveys that are taken before the program, and then again after the program in order to better capture how well the program performs. This information gathering is part of the monitoring and evaluation required by FATAA.

SABIT only accepts Participant Applications, Pre- and Post-Program surveys, and Alumni Surveys electronically. This is a change from the last collection request when it was possible for people to arrange other means of submission, including faxing and mailing.

Total burden hours for program surveys of participants has gone down, since we are more targeted in our surveys (especially the Long-Term, aka Annual Baseline, survey), based on our M&E plans.

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."

Certification Statement for Paperwork Reduction Act Submissions

On behalf of this Federal agency, I certify that the collection of information encompassed by this request complies with [5 CFR 1320.9](#) and the related provisions of [5 CFR 1320.8\(b\)\(3\)](#).

The following is a summary of the topics, regarding the proposed collection of information, that the certification covers:

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