SUPPORTING STATEMENT
U.S. Department of Commerce
Bureau of Industry and Security
BIS Program Evaluation
OMB Control No. 0694-0125

A. Justification

Request for Generic Clearance

1. Explain the circumstances that make the collection of information necessary.

The Bureau of Industry and Security (BIS) conducts seminars on various aspects of the export controls under BIS' jurisdiction. Feedback from these seminars is vital to ensuring the quality and relevance of outreach programs. Participants' completion of a voluntary survey provides BIS with immediate feedback on various program elements allowing BIS to improve and adjust its course offerings to meet the needs of the exporting community. BIS typically conducts over 20 seminars each year, both virtually and in-person at locations across the United States and overseas.

BIS typically has two major annual public events which offer opportunities for program feedback:

> (1) The Annual Conference on Export Controls is the Department of Commerce's flagship event on U.S. export controls. It provides an opportunity for exporting companies to interact with the U.S. Government officials who implement export control regulations, practices and policies intended to advance U.S. national security, foreign policy and economic interests. Presenters and attendees include a wide range of individuals involved in international trade, including senior U.S. Government officials, foreign government and business representatives, export compliance managers, corporate attorneys and consultants.

> (2) The Export Control Forum, conducted in California, provides an opportunity to learn about BIS' policies and initiatives and to interact with key BIS management, licensing, and policy staff.

In connection with each of these two events, BIS may, semi-annually, send previous attendees a request for topics for future Annual Conferences or Forums or request such input on the BIS website. This request for a response for topics is entirely voluntary.

While BIS organizes the Annual Conference with the help of an event planner, BIS partners with local non-profit groups (e.g., trade associations, District Export Councils) to organize the Forum and the other seminars. BIS' partnership is implemented via a memorandum of agreement that is

reviewed on an annual basis and cleared by the Department of Commerce's Office of Chief Counsel.

Besides the two major public events, BIS usually conducts 15 to 18 virtual and or in-person seminars throughout the U.S. annually. During these events, a Customer Satisfaction Survey is given to attendees to fill out on a voluntary basis. Historically, such surveys were cleared under individual information collection authorizations obtained by BIS from the Office of Management and Budget (OMB), a process that requires a considerable amount of time to obtain. In all cases, the reason for OMB authorization were to obtain permission (under the Paperwork Reduction Act) to collect information through the use of a Customer Satisfaction Survey from attendees on items such as topics, the speaker's knowledge of the topic, or other items which would be helpful to the industry to discuss. The use of a generic clearance process (fast- track) will allow BIS to conduct the data collection and final assessments in a shorter timeframe, thus providing policy and program offices with needed results possibly before the next seminar.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines

A survey form is distributed by BIS at the Annual Conference and the Forum as well as at seminar programs throughout the year. BIS typically offers seminars up to three to four times per month. While seminar and Forum participants are asked to fill out the evaluation form during the program and turn it in at the end of the program, annual conference attendees submit evaluations via App. The responses to the questions, which address the quality and utility of the programs, provide useful and practical information that BIS uses to determine that it is providing a quality program. The information provided also gives BIS information useful to further improve the programs, therefore showing attendees that BIS cares about their training experiences and values their viewpoints.

With respect to the specific questions on the form, it is important for BIS to know what the objectives of the participants were so that BIS can determine how well the course met those objectives. It is also important that BIS can ascertain if the price of the program was reasonable to the participants, as it is BIS's goal to ensure that participants can take advantage of the training at a reasonable cost. Knowing which concept or skill taught during the program was most and least important to the participants helps BIS to determine what adjustments should be made in its program in terms of amount of time spent on a topic and whether a topic continues to be relevant to program attendees.

Information on how attendees found out about the program assists BIS in its outreach efforts and improves avenues of information sharing. Knowing if attendees have participated in previous seminars and the time they have spent working in the export control field assists BIS in determining their level of expertise which is important when considering their comments, as those new to exporting may have a different view of program material than those with more

experience.   This information also assists BIS in ensuring that varying degrees of knowledge are considered and met. The information on attendees' level of comfort with the material before and after a program helps BIS in determining whether or not it has met its goal in improving the attendees' understanding of export control policies and procedures. Knowing if the information will assist attendees in their export compliance responsibilities ensures that BIS is improving this essential responsibility of the exporting community. Determining whether the information in the program met the expectations of the goals set out in the course description helps BIS to know whether or not it is describing its program appropriately to ensure that the attendees are getting what they expect out of the program.

A well-organized agenda is important to ensure that attendees understand the thought process necessary to determine export compliance responsibilities. BIS uses hands-on learning activities to assist in the attendees' understanding of program material and it is essential that BIS know whether or not attendees find these activities to be an effective learning tool. Knowing whether or not the attendees would recommend a BIS program to others helps BIS to determine if the quality of its programs will result in word-of-mouth promotion. BIS spends a great deal of effort in ensuring that the quality of its program material can serve as a useful reference guide to exporters, so it is important that attendees provide feedback on the quality of the material.

Knowing if the appropriate time is spent on each topic assists BIS in making adjustments to the program agenda to suit the needs of the exporting community. Asking attendees to rate each seminar topic for clarity provides valuable feedback on the effectiveness of the seminar programs. Note that the topics on which feedback is requested vary depending on the specific BIS program presented and other questions may be substituted depending on adjustments made to a particular program based on the program location or audience. An overall program rating provides BIS with a sense of the attendees' overall impression of the seminar which is used to measure the overall quality of BIS's programs and is a Government Performance and Results Act (GPRA) measurement for BIS. Requesting attendees to provide other suggestions for improvement or any other comments ensures that attendees are given every opportunity to comment on the program and to include information that BIS may have missed.

Some surveys give attendees the option of providing contact information (including name and company name, address, telephone number and fax) which allows BIS to respond to any direct questions or issues the attendee wants to discuss with BIS.

In addition to soliciting feedback from program attendees, BIS also requests post-event feedback from the groups with whom it co-sponsors the Forum and the seminars. This feedback not only also contributes to the overall quality of BIS' programs, including the pre-event organizational aspects, but also helps to ensure BIS' working relationship with its' co-sponsors. Feedback is provided by co-sponsors to BIS on a voluntary basis.

The evaluations that BIS requests from co-sponsors include not only many of the questions asked of attendees on the program quality but also inquire about BIS' performance in advance of the seminar. While questions about timeliness and completeness of BIS' communication with the

co-sponsor, the clarity of BIS' requirements (as specified in the MOA), the thoroughness of BIS' preparations, and the professionalism of BIS' staff allow BIS a more complete view of the quality and success of its offerings than does the feedback from attendees alone, the provision of suggestions for improvement, provide BIS with the opportunity to improve its work processes as well as its offerings.

The collected information will not be disseminated to the public.

3. <u>Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology</u>.

This collection may involve the use of any technology. While attendees at the Annual Conference are encouraged to use an App to provide feedback, evaluations are also provided in hard copy. At the Forum and at seminars, evaluations are provided as part of hand-out material to the program attendees.

The semi-annual request for topics is posted on the BIS website and sent to previous attendees via email and can be responded to by email or by the U.S. Postal Service.

4. <u>Describe efforts to identify duplication</u>.

This collection is not duplicated elsewhere. The respondents are exporters and other professionals working in the export control field who attend BIS programs as well as the non-profits groups partnering with BIS to organize seminars. This information is not available from any source other than from the respondents.

5. <u>If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden</u>.

This collection would not have a significant impact on small entities, as the program is open to any attendee, regardless of size, and participation in the evaluation is voluntary.

6. <u>Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently</u>.

If the collection was not conducted, BIS would be limited in its ability to get feedback from attendees and co-sponsors on the quality and value of its programs and ways to make improvements to ensure that exporters and other export control professionals are being properly educated on their export control responsibilities. To ensure the overall quality of BIS' programs, it is necessary to collect the evaluations at every program, as each audience has different background and needs.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

There are no special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

8. Provide information of the PRA Federal Register notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the 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.

The notice requesting public comment was published in the Federal Register on June 30, 2025, 90 FR 26267. No comments were received. BIS consults with Technical Advisory Committees (TACs) consisting of members outside the agency, who are leaders in the industry, to discuss with BIS current policies and standards both with the government and the public. ECRA states that the TACs advise the Under Secretary of Commerce for Industry and Security on controls under the Export Administration Regulations.

9. Explain any decisions to provide payments or gifts 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 assurance in statute, regulation, or agency policy.

Respondents are not required to provide their name when completing the evaluation form which provides for some confidentiality in their response. There is no assurance of confidentiality for this voluntary survey data in statute, regulation or agency policy.

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.

There are no questions of a sensitive nature.

12. Provide an estimate in hours of the burden of the collection of information.

This collection of information consists of approximately 3,030 responses annually.

3,000 responses from seminar attendees and approximately 30 replies from emails to co-sponsors are expected.

3030 replies x 10 minutes = 3030 minutes = 505 burden hours.

BIS designs its Program Evaluation survey instruments based on its' extensive experience in conducting outreach seminars.   Survey instruments are custom designed for each seminar. Examples of our survey instruments, including all questions we may ask, are provided with this request. When a new seminar is created or we are introducing new material, we ask more questions to help us improve the content, duration and quality of this new material.   Our survey instruments are designed to fit on one page, require ten minutes or less to complete and usually require the respondent to circle a numerical rating score.

The annual cost to the respondents is estimated to be $0.

13. Provide an estimate of the total annual cost burden to the respondents or record keepers resulting from the collection (excluding the value of the burden hours in Question 12 above).

There are no capitalized costs associated with this information collection.

14. Provide estimates of annualized cost to the Federal government.

The total annual cost to the Federal Government is estimated to be $5,805. This based on an average recording, copying and analysis time of 2 minutes for each of the 3,030 evaluations at an average salary of $55.00 per hour. The total cost also includes approximately $250 per year for the equipment used for copying and recording the data.

Salaries (2 minutes each = $55 per hour)
3,030 x 2 = 6,060 minutes/60 = 101 hours x $55 per hour = $5,555
Equipment   250
          TOTAL $5,805

15. Explain the reasons for any program changes or adjustments.

There are no program changes or adjustments for this renewal.

16. For collections whose results will be published, outline the plans for tabulation and publication.

There are no plans to publish this information for statistical purposes.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

BIS is seeking approval to not display the expiration date for OMB approval of the information collection because the collection is ongoing.   Having the form reprinted each time the OMB authorization lapses serves only to make otherwise good forms become obsolete.

18. Explain each exception to the certification statement.

There are no exceptions to the certification statement

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS