

**SUPPORTING STATEMENT
U.S. DEPARTMENT OF COMMERCE
NATIONAL INSTITUTE OF STANDARDS AND TECHNOLOGY
MANUFACTURING EXTENSION PARTNERSHIP EXPANDED SERVICES
CENTER INFORMATION AND REPORTING SYSTEM
OMB CONTROL NO. 0693-XXXX**

A. JUSTIFICATION

This is a request for Office of Management and Budget approval of a new information collection.

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

Sponsored by the National Institute of Standards and Technology (NIST), the Manufacturing Extension Partnership (MEP) is a national network of locally-based manufacturing extension Competitive Award Recipients working with small manufacturers to assist in improving their productivity, profitability, and enhance their economic competitiveness. The information collected will provide the MEP with information regarding MEP Competitive Award Recipients' 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 Competitive Award Recipients at both local and national levels, will provide information critical to monitoring and reporting on MEP programmatic performance, and will assist management in policy decisions. Responses to the collection of information are mandatory per the regulations governing the operation of the MEP Program (15 CFR parts 290, 291, 292, and H.R. 1274 – section 2). The information collected will include Competitive Award Recipient inputs and activities including services delivered, clients served, Competitive Award Recipient staff, quarterly expenses and revenues, partners and affiliates, strategic plan, operating plans, and client success stories.

NIST MEP provides funding to the Competitive Award Recipient through Cooperative Agreements. To ensure that Cooperative Agreements recipients are effectively disseminating modern technical and business solutions to small and medium-sized manufacturers in the United States, MEP will collect and analyze information from the MEP Competitive Award Recipients. MEP is mandated to collect this information by the regulations governing the operation of the MEP program (15 CFR 290, 291, and 292) and the Government Performance and Results Act of 1993 (GPRA, 5 CFR 1320).

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If NIST's Information Quality Guidelines apply, state this and confirm that the collection complies with the Guidelines.

NIST MEP collects information from Competitive Award Recipients on a quarterly basis. This information is used for the following purposes:

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

To support these needs, the “NIST MEP Management Information Reporting Procedures,” provides explicit instructions on how to complete applicable procedures.

- Competitive Award Recipient Information

Competitive Award Recipient Information will provide NIST MEP with general information such as addresses of the Competitive Award Recipient and Competitive Award Recipient locations, Competitive Award Recipient contacts and representatives, phone numbers, fax numbers, mailing addresses and e-mail addresses. This information will be used by MEP as a Competitive Award Recipient Contact List and as a vehicle to enhance communication among Competitive Award Recipient through the use of mailing lists and working groups.

- Client Information File (CIF) and Project Information File (PIF)

The MEP Client Information Files (CIF) and Project Information Files (PIF) will contain performance and market research data relative to each activity performed by the respondent Competitive Award Recipients during the reporting cycle. The CIF and PIF data will be analyzed and benchmarked to provide the organization with performance information needed to support continued investment in Competitive Award Recipients, and to identify areas of strength and weakness. The client and project files will also provide MEP with data regarding the markets being served by the Competitive Award Recipients, and the system. This type of data will be used to support MEP product and service selection.

- Progress Data Sheet

The Progress Data Sheet (PDS) will be used by NIST MEP to generate standard sets of reports that will be used for Competitive Award Recipient reviews. The reviews will monitor the Competitive Award Recipients’ performances compared to the operating plans, goals and objectives. The PDS will collect information on Competitive Award Recipient operations that include accounting data, number of employees, and activity levels for the quarter.

- Progress Narrative Sheet

The Progress Narrative Sheet (PNS) will be a narrative-based submission. The PNS will provide NIST MEP qualitative information on the following:

- Highlights of activities/services provided by the Competitive Award Recipient but not reported elsewhere (MEP refers to these activities as *non-substantive* activities)
- New services or service delivery strategies

- Updates on services/activities that were initiated or completed in conjunction with another organization through formal agreements (MEP refers to these organizations as partners)
- Discussion of Competitive Award Recipient's Marketing Plan as part of overall Operating Plan
- Dissemination of lessons learned and tools developed through the MEP system
- Information and discussion of the Competitive Award Recipient's market which includes:
 - Descriptions of promotional and marketing activities initiated by the Competitive Award Recipient that include metrics such as number of print ads, direct mailings, etc. The Competitive Award Recipient should also describe the associated service/events with the promotional and marketing activities.
 - Description of Competitive Award Recipients' customized marketing materials with an emphasis on the use of materials provided by NIST MEP
 - Discussion of Operating Plan (other than the Marketing Plan)

The PNS will inform NIST MEP of progress achieved towards specific items contained in the Competitive Award Recipient's operating plan. The PNS will serve as a diagnostic tool in monitoring the Competitive Award Recipient rather than measuring actual performance.

■ Partner and Affiliates Entries

MEP will use the Partner and Affiliates Entries to identify successful market distribution models and disseminate this information to the other Competitive Award Recipient. The Partner and Affiliates Entries are intended to provide the Competitive Award Recipient an easy-to-use and readily available mechanism to catalogue organizations (other than the regional Competitive Award Recipients).

One of NIST MEP's objectives is to help Competitive Award Recipients continually improve the delivery of services to smaller U.S. manufacturers. The Partner and Affiliates Entries will be a tool that NIST MEP and the Competitive Award Recipients will study to identify which Competitive Award Recipients have the most effective and efficient organizations. The organizational structure of Competitive Award Recipients varies by region, by state, and by market and the form of organizational structure may include a formalized agreement or may simply be a working relationship that developed over time. The existence of a formal agreement determines if the organization is a partner or the absence there of indicates the organization is an affiliate. NIST MEP will use this information to inform DOC, NIST, Competitive Award Recipients, and Congress about whom is in the MEP program. At NIST, the information is reported to the Director's Office, the Program Office, Legislative Affairs, and through the NIST public website, the general public. MEP informs both NIST and the DOC because they both use the information to evaluate the program. The Partner and Affiliates Entries will also be a general resource for providing information about the Competitive Award Recipients.

- Staff

The Staff listing will provide the Competitive Award Recipient an easy-to-use and readily available mechanism for reporting on its active workforce. The Staff listing will be a compilation of Competitive Award Recipient personnel that includes headcount and demographic information. The Staff listing will assist NIST MEP in tracking Competitive Award Recipient employee turnover. This information can be used to gauge the effects of the Competitive Award Recipients operating plans and assist in the reviews and budgeting process.

Anyone devoted to the Competitive Award Recipient, either through cash or in-kind payments, as delineated in the Competitive Award Recipient's current Operating Plan, will be considered part of the Competitive Award Recipient's staff and should be reported. Workers, indirectly paid through a subcontract, to work for the Competitive Award Recipient for a set amount of time per year or for a set amount of money per year, will be included as well. The Staff listing will initially be submitted when the Competitive Award Recipients register for access to the MEP Web site. NIST MEP will use the staffing and demographic information contained in the Staff listing for reports to DOC, NIST, NIST MEP, Competitive Award Recipients, and Congress and as a general resource for providing information about personnel at the Competitive Award Recipients. At NIST, the information is reported to the Director's Office, the Program Office, Legislative Affairs, and through the NIST public website, the general public. MEP informs both NIST and DOC because they use the information to evaluate the program.

- Contacts

Competitive Award Recipient Contacts information is collections of Competitive Award Recipient staff designated by the Competitive Award Recipient to represent the Competitive Award Recipient at working group meetings, special topic meetings and events. This information will provide NIST MEP with general information such as addresses, phone numbers, fax numbers, and e-mail addresses for Competitive Award Recipient representatives. This information will be used by MEP to communicate with Competitive Award Recipients through the use of mailing lists and working groups.

- State Funding Partners

The State Funding Partners entries are intended to provide the Competitive Award Recipient a readily available mechanism for reporting on its relationships with State and Local Government Officials. State Funding Partners are the primary funding decision officials for the program within the state or local government for the Competitive Award Recipient.

- Strategic Plan

Annually, each Competitive Award Recipient will submit a copy of its Strategic Plan. The Competitive Award Recipient will also provide the effective dates of the plan. This information will be used by Account Managers in their day-to-day role as the consultant to the Competitive Award Recipient.

3. 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.

NIST MEP *Competitive Award Recipient Reporting* system will make maximum use of computer technology to minimize the response burden. Competitive Award Recipients will submit collections in electronic files (i.e., Excel files) and where possible, use the World Wide Web (Web) to submit the required information through the Internet with specially developed software. Security controls will ensure that Competitive Award Recipients can only access their own data. The information will not be organized, searched, and/or retrieved using personally identifiable information.

Collections made via electronic files will facilitate respondents' data entry; ensuring correct and complete data collections while reducing the need for edit follow-ups. One of the key features of the Web-based NIST MEP *Management Information Reporting* system is the thorough editing of all submitted data for completeness, validity, and consistency. This editing is performed as the data are entered. The possibility of invalid data and all questionable or incomplete entries are called to respondents' attention before they are entered into the system.

Collections made via electronic files will utilize such user-friendly features as automated tabulation; data entry using custom controls such as pick lists, option menus, and check boxes; and data verification with error messages for easy on-line correction. In addition, a built-in reporting system allows NIST MEP to monitor the progress of the collection as well as to generate special reports on key items.

All Competitive Award Recipients have access to the Web. As a result, all reports are currently being submitted via the Web. Competitive Award Recipients that lack access to the Web will be provided an appropriate electronic and/or paper version of the data collection instrument.

4. Describe efforts to identify duplication.

Due to the unique partnership relationship between MEP and the Competitive Award Recipients, comparable data are not collected from these local Competitive Award Recipients. 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 Competitive Award Recipients. As a result, the information to be collected through this system will not duplicate any existing collection efforts.

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

Eligible institutions under the MEP program include state, and local governments, school districts, libraries, museums, universities, public organizations, nonprofit community-base organizations, and other nonprofit entities. We do not anticipate any of the respondents will be

considered a small business or other small entity as defined in the *Instructions For Requesting OMB Review Under The Paperwork Reduction Act*.

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

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 *Competitive Award Recipient Reporting* system. The data collected will help NIST MEP monitor and evaluate the Competitive Award Recipients' 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. Some of these data will be collected on a quarterly basis and will enable NIST MEP to identify Competitive Award Recipients in need of immediate assistance. Less frequent collection of data would result in the unacceptable situation of making significant policy decisions on the basis of obsolete and potentially misleading information. It might also delay the provision of assistance to the Competitive Award Recipients.

If the information is not collected, NIST MEP staff will be unable to monitor Competitive Award Recipients' 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 require the collection to be conducted in a manner inconsistent with OMB guidelines.

All data will be collected in a manner consistent with the guidelines in 5CFR 1320.6.

8. Provide a copy 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.

As required by 5CFR 1320.8(d), MEP's notice soliciting comments on the information was published in the Federal Register on September 10, 2010 (Vol. 75, No. 175, pg. 55303).

The development of the data collections and *Management Information Reporting* system is the result of extensive collaboration between NIST MEP and the Competitive Award Recipients. NIST MEP received input regarding data availability and frequency of the collection from its Evaluation Working Group, consisting of members of academia, consultants, and representatives of the Competitive Award Recipients. This group provided their professional opinions and expertise in developing the survey questions and protocol. Consultants continue to meet periodically and communicate electronically in a continuing effort to maximize response rates and ensure high levels of data quality.

Potential information collections are discussed/reviewed by the National Advisory Board, which meets three times per year. In addition, Competitive Award Recipient representatives will be able to comment on the collection process at the annual MEP National Conference and through meetings with user groups and information technology development specialists. The conference offers the opportunity for attendees to view presentations, receive the procedures in a bound format to take back to the Competitive Award Recipients. Competitive Award Recipient staff has an opportunity to review and discuss the materials among themselves before suggesting changes/revisions to NIST MEP.

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 confidentiality of all responses will be maintained to the extent permitted by law. No confidentiality for information submitted is promised or provided.

To protect the Competitive Award Recipients' privacy, only composite data or graphical representations will be included in the public reporting of the collection's findings. A statement to this effect will be presented to the Competitive Award Recipients prior to their submission of information.

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.

Not applicable, the types of questions asked are not likely to be considered sensitive. Questions focus on institutional or organizational information rather than on individuals.

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

Summary of Hour Burden

Number of Respondents (Competitive Award Recipients)	60
Burden per Respondent	20 Hours (Quarterly)

Total Annual Burden Hours 4,800

Annualized Cost to Respondents:	\$50/hour
Annualized Cost per Respondents	\$4,000

Total Annual Labor Cost to Respondents \$240,000

The information to be collected is information that the respondents must develop pursuant to their normal budget and strategy planning. The need for collecting this information was also outlined in the initial Request for Proposals. What a Competitive Award Recipient needs to prepare is minimal beyond what a Competitive Award Recipient is expected to do in their normal course of operations. Therefore, the costs to respondents will be minimal and the only expenses will be those required to review this information for consistency with NIST MEP *Competitive Award Recipient Reporting System* Procedures to enter this information into the appropriate collection form, and submit it to NIST MEP.

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 #12 above).

Not applicable.

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

The organization already has in place the necessary computing infrastructure, web development and database tools to support this effort, as well as, trained staffs that are familiar with developing and maintaining web based financial and knowledge sharing systems for MEP.

The total annualized cost to the federal government for developing, analyzing, and maintaining the NIST MEP Management Information Reporting System should not increase significantly as a result of this effort. As previously stated, a number of complementary activities already exist within the organization that will support the collection, management, and dissemination of the data from the respondent Competitive Award Recipients. Following the initial investment of labor to create the forms and supporting databases to collect and store the information, as well as, develop the supporting documentation and training, the annual costs should be absorbed by the organization through realignment of roles, responsibilities, and priorities.

However, it is anticipated that the NIST MEP Management Information Reporting System will require 2 people, 4 tasks per year, 40 hours per task at a rate of \$100 per hour for an estimated total of **\$32,000** for work performed by MEP staff for the NIST MEP Management Information Reporting System.

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

This is a new information collection.

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

The data will be collected indefinitely for internal review purposes and to monitor the Competitive Award Recipients, as well as for reporting to Congress. Reports dealing with the characteristics and performance of the Competitive Award Recipients 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
- Competitive Award Recipient Reports
- Internal Reports
- Presentations to MEP stakeholders
- Competitive Award Recipient Reviews

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.

Not applicable, the collection will display the expiration date for OMB approval.

18. Explain each exception to the certification statement.

Not applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.