
THE GEORGE WASHINGTON UNIVERSITY

WASHINGTON, DC

October 15, 2014

OIRA Case Officer for Bureau of Industry and Security
Office of Management and Budget
Washington, DC
Via OIRA_Submission@omb.eop.gov

To whom it may concern,

I appreciate the opportunity to respond to the request for comments regarding the proposed Bureau of Industry and Security (BIS) Competitiveness Enhancement Needs Assessment Survey Program data collection, as published in the *Federal Register* on September 15, 2014. As a research professor at the George Washington Institute of Public Policy, George Washington University, I focus on federal policies that support U.S. economic competitiveness. From that perspective, I support the intention of the proposed information collection to facilitate business access to useful federal assistance and applaud BIS's effort to aid firms in taking advantage of available resources. I offer several observations that I hope will enhance the proposed effort. The subjects of my comments are survey justification, distribution, and design and administration.

Survey Justification

My comments on justification of the proposed survey concern its authorization and the impacts of prior surveys.

➤ Authorization

For two reasons, I suggest that OIRA ask BIS to reaffirm and restate the authorization for the proposed information collection. First, while the ICR Supporting Statement, section A.1, indicates that the information collection is required under Executive Order 12919, in March 2012 President Obama revoked E.O. 12919 and replaced it with E.O. 13603.

Second, on September 26, 2014, President Obama signed the reauthorization of the Defense Production Act of 1950 (DPA). P.L. 113-172, originally filed as H.R. 4809, makes several changes in the DPA.

Consequently, I suggest that OIRA ask BIS to determine that the proposed survey is in fact authorized by E.O. 13603 and the DPA as newly amended. On the fairly reasonable assumption that the survey remains authorized, I suggest that OIRA ask BIS to note the sections of E.O. 13603 and the DPA that provide the basis for the proposed survey.

➤ Impacts of Prior Surveys

The [webpage](#) for OMB Control Number: 0694-0083 indicates that the BIS survey has been carried out on a regular basis for two decades. Thus, I imagine that BIS has an extensive history of the impacts of the survey—in terms of the number and percent of firms that obtained assistance through the survey and in terms of the impacts of that assistance. Consequently, I suggest that OIRA ask BIS to support the justification of the proposed survey by demonstrating the value of previous efforts.

If appropriate, OIRA also might consider a condition of clearance that directs BIS to systematically collect information on future survey impacts. As one option, OIRA might suggest that BIS look into an agreement with the Census Bureau's Center for Economic Studies (CES) to use the [Longitudinal Business Database](#) (LBD) to determine the growth of firms assisted by BIS relative to unassisted ones. CES has conducted similar studies for other federal business assistance programs, including the Manufacturing Extension Partnership, the Minority Business Development Agency, and the U.S. Commercial Service. Congress recently approved a Census budget initiative to provide this kind of evaluation service to federal programs.

Moreover, I believe that CES would find the content of the BIS survey of significant interest for its own research purposes. Consequently, I can imagine that CES might be willing to conduct an impact evaluation of the BIS needs assessment program at no cost in exchange for allowing the survey records to permanently reside in the LBD.

Survey Distribution

The ICR Supporting Statement, p. 2, indicates that the BIS Office of Technology Evaluation (OTE) “plans to distribute 8,000 surveys to small firms located in states adversely affected by economic downturns and program terminations as well as manufacturers in critical industries that support U.S. national security.” However, the Supporting Statement does not describe the process by which it plans to select survey recipients. As a consequence, I encourage OIRA to ask BIS to describe its firm selection process and the reasons why this process is optimal for achieving the survey's aim.

Given the frequent industrial base assessments and competitiveness evaluations carried out by OTE and the Defense Department's Office of Manufacturing and Industrial Base Policy (MIBP), it seems likely to me that BIS has an extensive list of defense-related firms that are good candidates for federal assistance. I suggest that OIRA ask BIS to indicate the extent to which BIS and MIBP assessments and evaluations serve as the source for the proposed survey's distribution list.

The Supporting Statement says that BIS has expanded the survey's scope beyond that of defense-related firms to firms “adversely affected by downturns and program terminations.” I suggest that OIRA ask BIS to justify this broadened scope in two ways. First, BIS might indicate

how the scope expansion beyond defense-related firms is authorized by E.O. 13603 and the DPA. Second, as firms hit by economic downturns and program terminations are served by multiple other federal business assistance programs (e.g., the Economic Development Administration, the Small Business Administration, the Manufacturing Extension Partnership Program, the Minority Business Development Program), BIS might indicate why it, rather than these other agencies, should serve as the point of outreach.

I'm pleased to read that the proposed survey will be administered online. In light of the survey's immediate electronic accessibility and its extraordinarily low cost, OIRA might consider directing BIS to distribute survey invitation letters on a rolling, opportunity-driven basis over the three-year period of clearance, rather than a one-time effort of fixed size. In this way, BIS would be in a position to maximize the number of firms informed of opportunities for federal business assistance.

Survey Design and Administration

I have several suggestions for improving the design of the survey instrument.

- I recommend updating the calendar years, as the draft instrument covers 2005 through 2008. (It looks like the same instrument was submitted to OIRA in 2008, 2011, and 2014, without change. The expiration date says 2011, rather than 2017.)
- I suggest that OIRA direct BIS to revise the survey to reflect the full breadth of services currently offered by federal business assistance agencies. For instance, I suggest adding [supply chain management](#) and [workforce development](#) to Section II.
- If OIRA finds a BIS-CES cooperative arrangement of interest, it might consider directing BIS to work with CES to align survey categories and language with other [Census business surveys](#), including the Economic Census, the Annual Survey of Manufactures, the Business R&D Survey, and the Survey of Business Ownership. In this way, the results of the BIS survey can be readily integrated with other records in the LBD.
- Moreover, Census has substantial experience testing and understanding how businesses respond to various types of survey design. OIRA might suggest that BIS work with the Census Bureau's Usability Laboratory to determine if the flow and wording of questions might be improved.
- The draft survey asks the respondent to email or mail the survey results to BIS. OIRA might direct BIS to create a system that electronically captures the responses and obviates the need for the respondent to manually submit them and BIS to manually record them.
- If BIS creates an electronic survey response mechanism, it could consider automating its assessment and facilitation assistance. That is, based on the respondent's set of answers, the BIS website could suggest programs appropriate to the respondent's needs. For instance, if a firm indicated its desire for assistance in

talent management, the BIS site could automatically direct it to the NIST Manufacturing Extension Partnership [SMARTalent Program](#). BIS still would follow up with the respondent to see if it could be of further assistance and still would be able to take credit for its matchmaking efforts.

I appreciate the opportunity to provide comments on the BIS Competitiveness Enhancement Assessment Survey and hope you and BIS staff find them helpful.

Sincerely,

A handwritten signature in black ink that reads "Andrew Reamer". The signature is written in a cursive, flowing style.

Andrew Reamer
Research Professor