

From: [Klimek, Shawn \(Federal\)](#)
To: [Katelynn Byers \(Contractor\)](#); [ITA Paperwork Reduction Act](#)
Cc: [Dumas, Sheleen \(Federal\)](#)
Subject: [External] OMB Control Number 0625-0143
Date: Wednesday, July 16, 2025 9:52:42 AM

Dear Katelynn,

It is my understanding that the International Trade Administration (ITA) does not collect Employer Identification Numbers (EINs) as one of the “company details”. If they do, my comment below doesn’t apply:

Consistent with the data sharing promoted in the Executive Order “Stopping Waste, Fraud, and Abuse by Eliminating Information Silos,” I would like to submit the comment/suggestion that the International Trade Administration (ITA) should collect the Employer Identification Numbers (EIN) issued by the Internal Revenue Service (IRS) as one of their company details for all of the U.S. businesses that are seeking their assistance. In 2015 under a reimbursable agreement with ITA, the Census Bureau published the working paper, “[Statistics on the International Trade Administration's Global Markets Program](#)” which used business name and address record linkage methods to combine business data from the ITA Global Markets program with microdata from the U.S. Census Bureau, for the purposes of studying and improving the Global Markets program. One of the lessons learned in 2015 was the utility of adopting “one or more standard firm identifiers.” The first one identified was the EIN. Since 2015, the EIN has been determined to be critical for record linkage to Census Bureau data. Collecting EINs permits record linkage to a host of additional measures available from the Census Bureau’s data collections and administrative data: the number of employees (including job creation), payroll, imports/exports and revenue on an ongoing basis. This would allow tracking short, medium and long terms outcomes of interest for firms participating in the Global Markets program. One point to note is what EIN to collect, since business may use more than one. If the primary data of interest is from the Census Bureau’s Business Register (employment, payroll, revenue), then the appropriate EIN is the one that the firm or establishment uses for report payroll to the IRS, typically on IRS form 941. If ITA’s primary interest is in their clients’ international trade transactions (exports), then the EIN they use on their customs declarations would be more appropriate.

From the Federal Register Notice:

“Interested persons are invited to submit written comments to Katelynn Byers, PRA Process Administrator by email, Katelynn.Byers@trade.gov or PRA@trade.gov. Please refer to OMB Control Number 0625-0143 in the subject line of your comments. Do not submit Confidential Business Information or otherwise sensitive or protected information.”

“The forms ask U.S. businesses standard questions about their company details, demographic

information, export/import experience, information about the products or services they wish to export/import and their goals. A few questions are tailored to a specific program type and will vary slightly with each program. ITA staff use this information to gain an understanding of clients' needs and objectives so that they can provide appropriate and effective assistance tailored to each U.S. business' particular global trade requirements."

And

"We are soliciting public comments to permit the Department/Bureau to: (a) Evaluate whether the proposed information collection is necessary for the proper functions of the Department, including whether the information will have practical utility; (b) Evaluate the accuracy of our estimate of the time and cost burden for this proposed collection, including the validity of the methodology and assumptions used; (c) Evaluate ways to enhance the quality, utility, and clarity of the information to be collected; and (d) Minimize the reporting burden on those who are to respond, including the use of automated collection techniques or other forms of information technology."

Best,
Shawn

Shawn D. Klimek, Ph.D.

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