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ABSTRACT

The General Accounting Office (GAO) evaluated the coordination of the export training offered to small businesses by the U.S. Department of Commerce and U.S. Small Business Administration through the U.S. Export Assistance Centers (USEACs). GAO staff visited 10 of the 19 USEACs. The agencies' training organizers or presenters were interviewed, agency documents were reviewed, and minority and women participants in the training programs were identified and interviewed along with some program participants identified by the USEACs. The Department of Commerce did not coordinate closely with the SBA when introducing its export-training program. As a result, Commerce and the SBA provided separate and duplicative training programs for potential business exporters, although the Commerce program is aimed at serving minority- and women-owned firms. Three of the 10 USEACs had combined both programs into a single export program. Evaluation of the various programs was impeded by the fact that neither Commerce nor the SBA systematically collected outcome data for their export training programs. The GAO recommended that the Trade Promotion Coordinating Committee eliminate duplication of export training services by determining the best way to combine the SBA and Commerce export-training programs delivered by USEACs. (Comments from the Department of Commerce are appended.) (MN)

United States General Accounting Office

GAO

Report to Congressional Committees

September 2001

EXPORT PROMOTION

Government Agencies Should Combine Small Business Export Training Programs

GAO

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GAO-01-1023

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United States General Accounting Office
Washington, DC 20548

September 21, 2001

The Honorable Christopher S. Bond
Ranking Minority Member
Committee on Small Business and Entrepreneurship
United States Senate

The Honorable Donald A. Manzullo
Chairman, Committee on Small Business
House of Representatives

The interagency Trade Promotion Coordinating Committee was created by the Export Enhancement Act of 1992 to coordinate the delivery of federal export promotion services and to eliminate the areas of overlap and duplication among federal export promotion programs.[1] The 1999 Export Enhancement Act reiterated that eliminating duplication was a primary Committee objective. In 1993, the Committee had recommended that three agencies—the Department of Commerce, the Small Business Administration, and the U.S. Export- Import Bank,—co-locate their staffs at a domestic network of 19 "one-stop shops," called U.S. Export Assistance Centers. These centers were to provide coordinated export training, as well as trade leads, export finance, and counseling to U.S. firms interested in becoming exporters. The Committee designated that the Small Business Administration be responsible for providing export training to new-to-export firms. Both the Department of Commerce and U.S. Export-Import Bank staffs provide information on their agencies' programs during the training sessions. Because export training is the first step in assisting new-to-export firms, you asked us to assess how well the agencies were (1) coordinating the delivery of export training and (2) measuring training program results.

[1]The U.S. Departments of Agriculture, Commerce, Defense, Energy, the Interior, Labor, State, Transportation, and the Treasury; the Agency for International Development; the Council of Economic Advisers; the Environmental Protection Agency; the U.S. Export-Import Bank; National Economic Council; the Office of Management and Budget; the Overseas Private Investment Corporation; the Small Business Administration; the U.S. Trade and Development Agency; and the U.S. Trade Representative comprise the Trade Promotion Coordinating Committee.

Results in Brief

The Department of Commerce did not coordinate closely with the Small Business Administration in introducing its export training program. As a result, Commerce and the Small Business Administration provide separate and duplicative training programs for potential small business exporters, although the Commerce program is aimed at serving minority- and women-owned firms. The goal of both programs is to create an interest in exporting and a demand for export services. Both training programs have the same objectives and similar content and seek to serve a similar mix of clients. Such duplication can result in agency staff being diverted from their primary responsibilities of making loans and counseling clients. Three of the 10 U.S. Export Assistance Centers that we visited had decided to combine both programs into a single export training program serving potential exporters. The Trade Promotion Coordinating Committee, located in the Office of the Secretary of Commerce, did not prevent these duplicative efforts.

Neither Commerce nor the Small Business Administration systematically collect outcome data for their export training programs. Instead, both agencies track the number of clients trained and Commerce identifies export successes for its clients overall but not specifically for its training participants. Small Business Administration survey data indicate that few training participants have used the export services provided by the centers sponsoring the training, but they do not explain the reasons for these results. Neither Commerce nor Small Business Administration staff systematically follow up with training participants to learn whether they have exported, the difficulties they encountered, and how the training programs might need to be adjusted to be more helpful. According to some training sponsors, the difficulty of recruiting qualified firms has resulted in the expansion of participant criteria to include non-export-ready firms, which may explain why few participants have used export services.

In this report, we are recommending that the Trade Promotion Coordinating Committee eliminate duplication of export training services by determining the best way to combine the Small Business Administration and Commerce's export training programs delivered by the U.S. Export Assistance Centers. We are also recommending that the U.S. Export Assistance Centers systematically follow up on new-to-export training participants as part of an effort to consider the training needs of small business in order to make program adjustments.

We provided a draft of this report to the Department of Commerce and the Small Business Administration. The Department of Commerce generally agreed with our analysis and planned to implement our recommendations. The Small Business Administration did not comment on the report.

Background

When establishing the U.S. Export Assistance Centers (USEAC) in 1993, the Trade Promotion Coordinating Committee (TPCC) designated the U.S. Department of Commerce as the primary provider of export promotion services, such as market information and counseling, to export-ready firms. The other USEAC partners, the U.S. Export-Import Bank (Eximbank) and the Small Business Administration (SBA), were to provide firms with export financing support. In addition, SBA was to provide training for new-to-export firms through its Export Trade Assistance Partnership program.[2] The program provides training, counseling, and trade mission opportunities available from federal, public, and private organizations.

Commerce's Office of U.S. and Foreign Commercial Service and SBA's Office of International Trade oversee their staffs at the 19 USEACs—generally one SBA loan officer and several Commerce trade specialists per USEAC. The USEACs are aided by a nationwide network of 55 domestically focused Commerce District Export Councils (comprised of local businesses) as well as over 1,000 Small Business Development Centers, partially funded by SBA.[3] In addition, USEACs partner with chambers of commerce, trade centers, and colleges and universities to encourage small businesses to expand their export activities and to assist small businesses seeking to export.

To increase the number of U.S. exporters, Commerce and SBA seek to identify export-capable firms that are not yet exporting and provide them with export training opportunities. Commerce and SBA staff recruit attendees through trade associations, chambers of commerce, advertising, seminar attendance, and cold-calling firms. SBA's Office of International Trade requires its staff to conduct one Export Trade Assistance Partnership program annually. SBA does not provide training program funding. Training facilitation is a collateral duty of SBA's staff at the USEACs and a small part of their required performance criteria.

[2]New-to-export firms may be new businesses that have never exported.

[3]Small Business Development Centers, located primarily at colleges and universities, are a cooperative effort among SBA, the academic community, the private sector, and state and local governments. The Centers provide information on exporting and assist firms with export loan applications.

Both SBA and Commerce work with other federal and state agencies to deliver the training curriculum. For example, SBA , Commerce, and Eximbank staff at the USEACs participate in export training by providing information on their agencies' programs. In addition, public and private entities, such as state export promotion agencies or local colleges, sometimes present information on specific export topics.

The Two Export Training Programs Were Not Coordinated

The Department of Commerce did not coordinate closely with SBA when it developed a separate Commerce export training program in 1999 as part of the Global Diversity Initiative—a Commerce effort to reach an underserved community of minority- and woman-owned firms. Six years after the TPCC delineated agency roles at USEACs, Commerce's U.S. and Foreign Commercial Service began offering export training, known as the Market Entry Program, that duplicated training provided by SBA. Not only are the program objectives similar, but the participant criteria and the curricula are very much the same. (See table 1.) Moreover, speakers for the programs were the same. Several of the centers have combined program presentations. TPCC officials, located in the Secretary of Commerce's Office, were aware that Commerce had instituted the Market Entry Program at the USEACs but were unaware that it duplicated SBA's training.

Table 1: Components of SBA and Commerce Export Training Programs

Program objectives and components	SBA Export Trade Assistance Partnership Program	Commerce Market Entry Program
Main program elements	Partner with state and local trade organizations to assist exporters. Train firms on exporting. Counsel firms and develop market plans. Participate in trade shows and missions.	Leverage state and local resources to assist exporters. Train firms on exporting. Counsel export-ready firms. Participate in overseas trade missions.
Program began	Mid-1990s	1999
Agency training requirement	1 annually	1 annually
Agency funded program	No	Yes
Objective	To increase exports.	To increase exports and use of Commerce products.
Target	Any new-to-export and export-ready firms.	Various minority new-to-export and export-ready firms.
Participant criteria	Established business with an exportable product or service suited for international markets and a positive net worth.	Established business with an exportable product or service suited for international markets, a positive net worth, and marketing materials.
Minimum participants	10	No requirement
Minimum hours	18	15
Trade mission required	Optional	Required
Trainee follow-up required	Yes	Yes

Source: GAO table based on information provided by the Department of Commerce and SBA.

Seven of the 10 U.S. Export Assistance Centers we visited had conducted both Export Trade Assistance Partnership and Market Entry Programs. Training agendas at three of these centers were identical, while the training agendas at the remaining four centers were similar. Similar course topics for both programs include market research, market entry and pricing, legal aspects of exporting, required documentation and transportation methods, the regulatory environment of importing countries, international methods of payment, trade finance, and cultural nuances.

SBA and Commerce USEAC staff at nearly all of the centers that we visited routinely present information on their services at each other's programs. Moreover, both agencies' staff assist each other in identifying potential training participants. The one SBA staff at each USEAC not only develops the SBA training as a collateral duty but also participates in Commerce's training program. Sponsoring the program can be time-consuming, particularly the process of recruiting firms, according to SBA officials. SBA program guidelines suggest using Commerce staff and others to help design and deliver the program, and Commerce USEAC staff have done so. Commerce, which has several staff at most USEACs, has dedicated staff to facilitate the Market Entry Program and has provided program funding. In addition to 2 headquarters staff administrators, Commerce has dedicated 4 staff as field coordinators and 21 as trade specialists in the USEACs to assist with the training, in addition to their other duties. Market Entry Program guidelines require Commerce program coordinators to use SBA staff to identify and provide outreach to minority firms.

Because both training programs have similar course topics and common presenters and serve similar clients, Commerce and SBA staff at three U.S. Export Assistance Centers have combined the Export Trade Assistance Partnership and the Market Entry Programs into a single training program. Officials in three other U.S. Export Assistance Centers that held separate training programs believed that the two training programs shared similarities and could, therefore, be joined.

TPCC Did Not Identify Duplication

The TPCC, mandated to eliminate duplication in federal programs that promote U.S. exports, was unaware that Commerce's program duplicated SBA's training program, although the TPCC was aware of Commerce's program and used it to support its budget priorities in a November 1999 memorandum to the Office of Management and Budget (OMB). The TPCC annually requires member agencies to submit information on their trade promotion efforts and identify program or agency issues as part of its mandate to create a unified budget and eliminate duplication. Citing the need to better coordinate trade promotion activities, the TPCC prioritizes member agencies' needs, uses agency initiatives to support those priorities, and submits a memorandum to OMB outlining them. Commerce's Global Diversity Initiative, identified as a relatively new initiative to outreach to underserved communities, was included to support a requested increase in funding for Commerce's U.S. and Foreign Commercial Service small business programs. When we spoke with TPCC officials in March 2001 regarding the similarities in SBA's and Commerce's export training programs, they were unaware of how the programs were duplicative. The TPCC interagency working group on small business, the forum where such an issue would be discussed, had not met for several years, according to an SBA official.

Performance Measures Provide a Partial Picture of Training Program Results

Commerce and SBA do not systematically collect information on the number of new exporters or the export sales the training programs generate. Commerce tracks information on clients generally but does not distinguish between trainees and other clients, and SBA does not consistently track training participants' exports. SBA data collected in the spring of 2001 indicate that only a few training participants later used Commerce's products and services. Our interviews with USEAC personnel suggest that the difficulty in recruiting export-ready firms, as well as the normal challenges that exporters face, may contribute to this low usage of pre-export products and services.

Measures Are Geared to Pre-export Activities

Commerce and SBA track certain pre-export activities as outputs for the purpose of measuring both USEAC and staff performance. Commerce collects data on the number of new clients' export actions (such as going on an overseas trade mission) and export successes, but it does not track these measures specifically for trainees. SBA regularly collects loan data for its clients, but it does not systematically collect data on export sales generated by training participants. For example, SBA headquarters officials requested data on export sales generated by Export Trade Assistance Partnership Program participants in fiscal year 2000, but several SBA staff at the USEACs that we visited told us that no such request has been made for fiscal year 2001. However, an SBA official told us that SBA intends to collect this information again in fiscal year 2001.

SBA and Commerce Data Show Limited Use of USEAC Products and Services

USEAC training programs ideally increase the number of new exporters and also expand the demand for Commerce and SBA products as firms seek information on specific markets and export finance. However, few of the USEAC training participants used an export product, such as customized market research, following training. In response to our request for data on its export-training participants, SBA initiated a USEAC-wide survey of its trainers in April 2001.[4] According to SBA officials, only 182 of the 1,196 participants (about 15 percent) in the 62 Export Trade Assistance Partnership Program training sessions held between 1998 and 2001 subsequently used a Commerce export product or service. Some training participants used a Commerce product but did not go on to export.

[4]SBA told us that 16 of the 19 USEACs responded to the survey.

Training Participants Were Not Systematically Tracked

We were unable to determine how many training participants became active exporters or the value of their exports because the USEAC staff do not systematically follow up on attendees, although such follow-up is a program requirement for both SBA and Commerce training programs. Training program organizers for both programs survey participants at the end of the training, but they do not systematically collect data on how many participants go on to export and the value of their subsequent export sales. As mentioned earlier, SBA conducted a one-time survey to collect that data, but it does not do so on a regular basis. In that survey, SBA trainers reported that 96 of the 1,196 firms that received training (8 percent) had generated $452 million in export sales. However, that data may overstate program results. According to the survey data provided to us, a portion of the export sales identified came from firms that had received export training but also had already been exporters. Consequently, not all of the $452 million in export sales can be claimed as a result of the training received by these firms.

According to Commerce officials, it takes about a year or more to become an active exporter. SBA officials said that they may become aware of training participant exports when the participant uses a USEAC product, but they said that they have not been able to systematically track graduates. Commerce's Market Entry Program, begun in fiscal year 1999, has had time to show some results. Commerce officials also cited the difficulty of tracking participants but told us that they knew of a few participants that had gone on to export. Tracking training participants is both time-consuming and challenging, according to both SBA and Commerce officials, due to the lag time between the business's first exposure to the training material and its eventual success in entering an export market. Other factors may also complicate the collection of data needed for tracking outcomes. In some cases, for example, firms that are already exporting may send its employees for training, but it would not be appropriate to count these firms as new exporters or count their exports as additional exports. As a result, training managers do not have the data to guide decisions about program improvements or to assess whether the training program is generally successful in reaching its objective.

Recruiting Difficulties May Affect Performance

The inability of trainers to recruit qualified training participants could affect USEACs' meeting their performance goal of an increased number of exporters and increased use of products. Recruiting qualified participants sometimes proved difficult for the training organizers, and training program officials told us that some training participants were not ready to export, in terms of having a proven business record and an exportable product.

USEACs that had difficulty recruiting qualified potential exporters relaxed the criteria for participation for a variety of reasons. According to SBA and Commerce officials, a general lack of interest in exporting by small firms and the availability of similar training locally at world trade centers and universities make it difficult to find firms willing to dedicate work time to training or to find qualified training participants. At one USEAC, several classes were cancelled due to lack of interest, while other USEACs experienced high dropout rates. Difficulty in recruiting and the need to fill classes resulted in letting firms enroll, even if they did not have an exportable product or were in fact large manufacturing firms. Moreover, not all participants in the seminars were focused on becoming exporters. For example, with local needs driving course content, the objectives in one training seminar were expanded to include providing information about importing. Also, one SBA official opined that USEAC staff may have relaxed the criteria in order to meet agency training requirements for conducting export training.

Other Factors Affect the Success of Export Training

Other factors affecting the success of export training programs include the general obstacles all exporters face. Training officials told us that exporters face numerous difficulties in foreign markets, such as finding local agents as well as dealing with requirements imposed by foreign governments. In addition, small business loans have become increasingly difficult to find due to changes in the U.S. banking sector. Firms that are eventually successful can take 12 to 18 months before being ready to export, thus making it more difficult to monitor them systematically and attribute the resulting exports or use of export services to the training program.

Conclusion

The TPCC recommended the establishment of the USEACs in order to provide potential exporters with one-stop shops where agencies would work together to make the best use of their expertise and resources. Yet Commerce and SBA are providing export training programs at the USEACs that are virtually identical in their key program elements. Commerce's objective of increasing various minority and women exporters through training could have been accomplished by coordinating with SBA trainers to emphasize minority- and women-owned businesses when recruiting for their program. In fact, both agencies have experienced difficulties in identifying export-capable firms that could benefit from export training and in recruiting such firms for the training programs they are providing. Also, Commerce and SBA have not systematically conducted follow-up contacts with training participants in order to understand their export experiences and make training program adjustments to better serve potential small business exporters. In addition, Commerce's duplication of SBA training illustrates that the TPCC has not fully met its mandate to coordinate trade promotion agencies' efforts and eliminate duplication.

Recommendation for Executive Action

We recommended that the Trade Promotion Coordinating Committee eliminate duplication of export training services by determining the best way to combine SBA's and Commerce's export training programs delivered by the USEACs. In addition, we recommend that the USEACs systematically follow up on new-to-export training participants as part of an effort to consider the training needs of small businesses in order to make program adjustments.

Agency Comments

The Department of Commerce's Office of International Trade generally concurred with the report's findings and planned to integrate SBA and Department of Commerce export training programs in fiscal year 2002. The office also plans to conduct a more systematic follow-up with training participants as we recommended. The Department of Commerce's written comments are presented in the appendix. The Small Business Administration did not provide comments.

Scope and Methodology

To determine how well the USEAC partners coordinated export training, we interviewed and obtained data from Department of Commerce; SBA; Eximbank; and TPCC staff in Washington, D.C., and at 10 USEACs (Baltimore, Chicago, Dallas, Denver, Detroit, Long Beach, San Jose, New Orleans, St. Louis, and Philadelphia). We selected these centers after contacting all 19 USEACs to identify those with training programs and by including centers that SBA recommended as having good programs. We interviewed agencies' training organizers or presenters, obtained agency documents establishing the programs and training agendas, and had USEAC staff identify various minority and women participants in the training programs. We also talked with some program participants identified by the USEACs. In addition, we requested further data on SBA's training program, which SBA obtained by surveying USEAC staff in April 2001.

To determine how the agencies measured the results of their export training programs, we obtained and examined USEAC and agency strategic plans, personnel performance measures, agency performance reports, and an internal Commerce evaluation of key products. In addition, we discussed performance measures with senior agency and USEAC staff.

We performed our work from March through July 2001 in accordance with generally accepted government auditing standards.

As you requested, we plan no further distribution of this report until 30 days from its issue date. At that time, we will send copies of this report to the Senate Committee on Small Business and Entrepreneurship and the House Committee on Small Business, other interested congressional committees, the Secretary of Commerce, and the Administrator of the Small Business Administration. We will also make copies available to others on request.

If you or your staffs have any questions regarding this report, please call me at (202) 512-4128. Key contributors to this report were Virginia Hughes, Judith Knepper, Victoria Lin, Patricia Martin, and Hector Wong.

Loren Yager

Director,
International Affairs and Trade

Appendix: Comments From the Department of Commerce

UNITED STATES DEPARTMENT OF COMMERCE
The Under Secretary for International Trade
Washington, D.C. 20230

SEP 12 2001

Mr. Loren Yager
Director, International Affairs & Trade
United States General Accounting Office
Washington, D.C. 20548

Dear Mr. Yager:

Thank you for the opportunity to comment on the draft GAO report "Export Promotion: Government Agencies Should Combine Small Business Export Training Programs." We agree with the stated objective of the report. In fact, the Commerce Department and the Small Business Administration (SBA) will integrate their programs in FY 2002 as part of an ongoing effort to improve our small business outreach activities. We also found the discussion of systematic follow-up with training participants helpful, particularly given the challenges of doing this effectively. As you know, Secretary Evans, as chair of the TPCC, has recently launched, with key TPCC principals, a major benchmarking exercise that will systematically look at all of our trade promotion processes, including training. The exercise will assess customer satisfaction and best practices in order to make recommendations for their improvement in our March 2002 National Export Strategy Report to Congress.

We believe stronger coordination of SBA and Commerce programs - both at headquarters and in the field - are worthy goals which deserve the future attention of the TPCC. In our benchmarking study, we will look at customer satisfaction of our key export promotion programs - both through a random survey of small businesses and through targeted focus groups of our clients - and will learn more about the kinds of training programs small businesses find most useful. We will also try to learn about how our trading partners accomplish their training objectives, look for examples of world class programs abroad and in the private sector, and recommend applying what we discover, if appropriate, to our own programs in our March 2002 Report.

I do think it might be helpful to you and your analysis if I could amplify a number of points raised during our discussions with you and your staff:

Duplication: First, I want to emphasize that the Global Diversity Initiative (GDI) was not limited to training. The broader goals envisioned by GDI add value to, rather than duplicate SBA's E-TAP program. While SBA's program was directed to all small business exporters, Commerce's GDI initiative was focused exclusively on minority firms and underserved markets. Statistics show that the number of businesses owned by minorities and women has grown at a

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faster pace than the overall business community. Between 1992 and 1997, minority firms had a 30 percent growth rate compared to the only 7 percent increase for all U.S. firms. We believed giving every opportunity to minority firms to develop their export potential was worthy of special emphasis and that a separate GDI/MEP initiative would more effectively build bridges to underserved communities. As a result of our efforts, we are much closer to our goal of capturing the interest of minority companies in exporting. For example, now we have in place a much stronger national network and certain minority performance requirements incorporated into the U.S. Export Assistance Centers' plans. A major thrust of GDI has been to develop strategic partners in minority communities throughout the United States that can serve as the link between the Commercial Service and minority owned firms. These partnerships have helped us to better understand the specific needs of minority companies interested in exporting so that our programs can be more responsive to these needs. Additionally, GDI incorporated e-commerce services into the outreach effort. Now that the GDI program has matured on a variety of fronts, the decision was made to integrate the training element with the E-TAP program.

GDI/MEP was intentionally patterned on E-TAP to avoid duplication of effort in the field. As stated in its first report to Congress in 1993, the TPCC recognized that, "...no single design for one-stop shops is likely to work nationally." Each USEAC brings to bear a different set of personalities, skills, and strengths and must meet a different range of exporter needs and interests. The main partner agencies in the USEAC network, Commerce, SBA, and Ex-Im encourage their local managers in the field to take the initiative to improve program coordination and avoid duplicative effort. In our view, this is what happened in the case of the Commerce and SBA training programs. Headquarters encouraged local initiative and flexibility, and local variations in agency resources and business conditions played a role.

The TPCC was aware of both training programs, but concluded that GDI was a new and legitimate initiative, and that coordination could be managed by headquarters and local USEAC staff. The fact that three of ten USEACs examined by GAO combined their training programs is evidence of this local coordination. The dialogue among agencies on SME programs, including training, is alive and well: TPCC USEAC working group members at headquarters communicate regularly and are currently in the process of renewing the interagency Memorandum of Understanding (MOU) defining the cooperative mechanisms of the USEAC system.

Training Needs of Local Business: Second, recruitment for our training programs has proved challenging, as indicated in the report. Top goals of the USEACs are to increase awareness of the availability of export opportunities and programs and to build the base of firms that export. With these goals in mind, USEAC training programs typically reach out to small businesses, particularly new exporters. The report provides accounts of some of the problems USEACs have recruiting such firms. These accounts will help inform our efforts to develop tracking and feedback systems.

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However, we believe training clearly makes a contribution to the exporting success of a wide variety of firms. Once a company exports for the first time, that company's training needs do not necessarily disappear. In fact, ongoing training of staff may be needed for a firm to remain an active exporter. We have heard from firms of all sizes that employee turnover can be an obstacle to maintaining an export presence. The departure of one key worker can stall a company's export plans. Large companies can also have legitimate training needs. Nearly forty percent of all large exporters sell to fewer than five markets. These so-called "anemic exporters" typically fill unsolicited orders, but do not have an active exporting strategy and capability.

Systematic Tracking. We believe that a fundamental ingredient of meeting the training needs of exporters is program feedback. Both SBA and Commerce have taken measures to follow-up with training participants, and have plans for implementing more regular tracking procedures. The Commercial Service is in the process of developing and implementing a more systematic means of measuring all of its programs, including outreach and training in the domestic field. SBA has begun regularly tracking export sales generated by E-TAP training participants as part of its Government Performance and Results Act requirements. While Commerce does not currently have a process for tracking training participants, it does systematically follow-up with MEP trainees to provide exporting opportunities. Within the first year of the training program, for example, each participant was offered an opportunity to participate in a trade mission to Canada or Mexico.

Again, thank you for your work on the report. We agree with your basic conclusion - and have already undertaken - the integration of SBA and Commerce training programs. We look forward to developing recommendations as part of the TPCC benchmarking process to address how to further improve the coordination and measurement of the success of our programs, and your discussion will inform our efforts.

Please let me or my staff know if we can be of further assistance.

Sincerely,

Grant D. Aldonas

(320030)

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