

SUPPORTING STATEMENT FOR APPROVAL

A. Justification

1. Legal authority for this information collection is found in 22 U.S.C, Section 234 (d) of the Foreign Assistance Act (FAA) of 1961, as amended. This application is sent to U.S. companies and individuals requesting financing under OPIC's finance program. The information provided is reviewed by OPIC finance officers to determine the soundness of the proposed project and the applicant's qualifications for receiving OPIC financial assistance. The information collected through the OPIC-115 form enables OPIC to comply with its congressional mandate to manage the program in a prudent manner and to ensure that projects that would have significant adverse effects on the U.S. economy and employment do not receive OPIC support.

Proposed amendments to OPIC-115 form:

- Improved Application Efficiency
First, the form has been more clearly divided, with only Part I being filled out preliminarily, containing sufficient information for OPIC to broadly determine whether a project financing request fits within its programmatic guidelines. If not, the applicant is so advised, and both the applicant and OPIC save time and cost. If the applicant appears eligible, they will then be asked to complete Parts II, III, and IV. Second, we have undertaken a thorough review of the language used throughout the application to make it both more readable and consistent.
- Attachment I Added
In order that OPIC may more carefully review selected applicants, sponsors and shareholders of projects that OPIC may finance, a short Attachment I has been added to the application that requests specific information that will enable OPIC's Information Center to conduct more detailed background checks when necessary. It is expected that Attachment I will be filled out on an exception only basis, where OPIC determines that it needs more information about a sponsor in order to complete its due diligence in underwriting the loan request.
- Host Country Development Effects
Efforts have been undertaken to clarify both the wording of the questions and the format to make the developmental information easier to the applicant to fill out, and for OPIC to interpret. We have also created a separate set of questions that are applicable to financial services and financial intermediaries, a category to which OPIC is increasingly lending as a means of extending its reach and programs to small and medium size enterprises. This too provides efficiencies, since the questions are directly geared to financial services.

- Worker Rights
Additional questions have been added to the worker rights section to help assure OPIC that it is obtaining the information required to analyze any areas of concern in the proposed project.
2. On an annual basis, OPIC receives approximately 150 applications from U.S. companies. The information collected is used by OPIC finance officers and analysts to determine the eligibility of the investor and the project for financial assistance. OPIC collects one response per project. OPIC continues to rely on the material representations provided by the investor in the OPIC-115 in its determinations.
 3. Using a standard form, the collection of information enables OPIC to “log” and track all applicant data in a consistent manner, improve internal information management procedures and more efficiently respond to each applicant. The Agency is performing business process re-engineering on all business practices, which includes examining application process to enable applicants to submit the information electronically to minimize the burden and reduce expenses. The use of a web-based application will also enable valuable pop-up definitions and explanations and webpage links that should both facilitate the applicant’s answers and help assure the data submitted accurately reflects the intent of the question asked.
 4. The information collected is not duplicated elsewhere. The information is not already available in any other electronic form and would not be requested by another federal agency or lending institution since it is applicable solely to OPIC’s finance program.
 5. Questions asked of applicants, whether they are large or small, require only brief answers. In another efficiency, we have been able to eliminate the lengthy written guidelines that use to accompany the application. We are able to achieve this through clearer word usage in the application itself, as well as web based links to definitions and program explanations available on OPIC’s web site.
 6. Without a form to collect the information, the amount of staff time needed to gather the requisite information would be significantly greater and would result in multiple requests for information for program users. This would reduce the amount of time that could be devoted to credit underwriting, marketing OPIC programs and analyzing the monitored projects, thereby reducing the productivity and administrative efficiency of the finance program.
 7. No special circumstances exist that require the information collection to be conducted in a manner inconsistent with the guidelines of the Paperwork Reduction Act and OMB's implementing regulations.
 8. The first Federal Register Notice was published on **[6/ 19 Vol. 72, No. 111/ 2007]**. OPIC did not receive any public comments in response to this notice. The second Federal Register Notice was published on **[8/22/2007, Vol. 72, No. 162]**.

In addition to the formal register notice, OPIC Finance undertook to have two OPIC clients, a private consultant, as well as three OPIC interns new to the finance department, review and comment on the application form, wording and content in order to get external input to improve the application.

9. No payments and gifts are offered to respondents.
10. OPIC provides respondents the assurance of confidentiality by labeling the bottom of each page of the OPIC 115 form with the phrase, "Privileged Business Information". Client information contained in this questionnaire will be deemed designated as privileged or confidential in accordance with OPIC's Freedom of Information Act (FOIA) regulations (22 CFR part 706) and will be treated as confidential to the extent permitted under FOIA.
11. Not applicable. None of the questions on this form are of a sensitive nature.
12. The estimated burden of collecting this information is as follows:
 - 150 respondents
 - x 1 per respondent
 - 150 total annual responses
 - x (1.95 hours per average respondent)
 - 293 respondent hours
 - x \$75 for personnel, record-keeping, overhead
 - \$21,975 total cost to respondents

Annual reporting is not required. Information is only collected once per investment. In order to determine the burden to respondents in filling out the revised OPIC finance application (OPIC-115), the following methodology was used. Four persons new to the OPIC application process were asked to fill out the revised application form and record the amount of time Part I took, as well as the amount of time for the balance of the application. Part I took an average of 45 minutes, which is the basis for using the 0.75 hours for 50% of the respondents who never proceed beyond Part I. The range of time for filling out the complete application (Parts I, II, III, and IV) was from 2.75 hours to 3.92 hours, and the average of the four was 3.15 hours (for completing the full application. Therefore, the average applicant will spend 1.95 hours).

13. The estimated annualized cost to respondents is as follows:
 - (a) Total capital and start-up costs: \$0
 - (b) (I) Total operation and maintenance costs: \$0.All costs associated with the form are part of the normal cost of doing business.
 - (ii) Non-labor Costs to OPIC clients completing this information collection is as follows: Administrative and storage expenses for electronic & paper-based submissions: \$2.40 Postage costs for paper-based submissions: \$1.06

14. The estimated annualized cost to the Federal government is 150 responses 0.5 hours x 75 Part I only applications; and 2.08 hours for the 75 completed applications. Using an average cost of \$45.11 (a GS-14/1) to review these applications, the total cost to the Federal government is estimated to be \$8,729 $\{(75 \times 0.5 \times \$45.11) + (75 \times 2.08 \times \$45.11)\}$.
15. The number of total respondents (150) is based on the approximate number of companies formally applying for OPIC finance each year. Although several questions have been added to the revised OPIC-115, the bifurcating Part I from the remaining parts overall reduces both the response time and the OPIC review time. However, looking solely at the time required to complete the full form, the respondent's time to complete the form has been reduced from the 3.6 hours estimated in FY2004 to 3.15 hours due to clarifying the format and word usage. The time for OPIC to review the slightly longer form has increased from 1.5 hours to an estimated 2.08 hours, but because the information is more complete, overall time in processing the loan requests is expected to improve.
16. Not applicable. Information provided in the application is not published or made public in any way.
17. Not applicable. The OMB expiration date will be printed on each form.
18. Not applicable. No exceptions are being requested on the certification statement.