

Supporting Statement for Paperwork Reduction Act Submissions
Export Import Bank
Information Collection Notice – Payment Default Report – EIB 09-01

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain information specified in Section A below. If an item is not applicable, provide a brief explanation. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The Export Import Bank (Ex-Im Bank) of the United States, pursuant to the Export-Import Bank act of 1945, as amended (12 USC 635, et seq.) facilitates the export financing of U.S. goods and services. The Payment Default Report allows insured/guaranteed parties and insurance brokers to report overdue payments from borrower and/or guarantor.

2. Indicate how, by whom and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The collection provides Ex-Im Bank staff with the information necessary to monitor the borrower's payments on export finance credits guaranteed or insured by Ex-Im Bank under its various programs. It also provides information about the likely cause of the default, actions taken, and prospects for the default to result in a claim on Ex-Im Bank. The information will be used by Ex-Im Bank's Asset Management Division, Portfolio Review and Reporting Division and its credit underwriting unit.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submissions of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

Customers will submit this form electronically through Ex-Im Online, replacing paper reporting. Ex-Im Bank has simplified the reporting of payment defaults by including checkboxes and providing self-populating fields.

4. Describe effort to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

Ex-Im Bank is not the lender under its guarantee and insurance programs; accordingly information about payment defaults would come from the insured/guaranteed lender. All payment defaults are independent of each other, therefore no duplication.

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

Not applicable.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Without accurate and timely reporting of payment defaults, Ex-Im Bank's ability to monitor its portfolio and initiate timely recovery actions against defaulting borrowers would be significantly impeded, resulting in additional losses to the USG. This information is also critical when underwriting new transactions to avoid approving credits to defaulting parties.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner"
 - *requiring respondents to report information to the agency more often than quarterly;
 - *requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
 - *requiring respondents to submit more than an original and two copies of any document;
 - *in connection with a statistical survey, that is not designed to produce valid or reliable results that can be generalized to the universe of study;
 - *requiring the use of statistical data classification that has not been reviewed and approved by OMB;
 - *that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
 - *requiring respondents to submit proprietary trade secrets, or other confidential

information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

Collection is consistent with guidelines in 5 CRF 1320.6.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.

Copy of form uploaded to ROCIS. Information Collection Notice was published Tuesday, April 7, 2009.

We have received no public comments.

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.

Ex-Im Bank and its offices and employees are subject to the Trade Secrets Act, 18 USC Sec 1905, which requires Ex-Im Bank to protect confidential information from disclosure, as well as 12 CRF 404.1 which provides that, except as required by law, Ex-Im Bank will not disclose information provided in confidence without the submitter's consent.

11. Provide additional justification for any question of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered provides. This justification should include the reasons why the agency considered the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

Not applicable.

12. Provide estimates of the hour burden of the collection of information. The statement should include

*the number of respondents;	200 ¹
*estimate time per respondent;	15 minutes
*the frequency of response;	On occasion

¹ This is an average on the number of transactions where an overdue report was filed during the past three and a half years (2006 to June 2009). It is highly likely that EIB might have received more than one overdue report per transaction, which would significantly increase this average by a factor of four to six times.

*annual hour burden; and 50 – 60 hours
*an explanation of how the burden was estimated.

The annual hour burden was calculated based on an average number of transactions where an overdue report was filed. It is highly probable that EIB might have received more than one overdue report per transaction, which would significantly increase this average by a factor of four to six times.

13. Provide an estimate for the total annual cost burden to respondents or records keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in items 12 and 14).

Not applicable

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

Reviewing time per hour	5 to 10 minutes
Responses per year	200 Error: Reference source not found
Reviewing time per year	16.67 hrs to 33.33 hrs
Average wages per hour	\$35
Average cost per year (time * wages)	\$583.45 to \$1,166.90
Benefits and overhead	100%
Total Government Cost	\$1,166.90 to \$2,333.80

15. For collection of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Not applicable – new form

16. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Not applicable

B. Collection of Information Employing Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results.

ExIm might perform statistical analysis based on the information collected to estimate probabilities of default and eventual claims.