

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION 3048-0023
FORM EIB 92-50**

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 of the United States, pursuant to the Export Import Bank Act of 1945, as amended (12 USC 635, et.seq.), facilitates the finance of the export of U.S. goods and services. The “Short Term Multi-Buyer Export credit Insurance Application” form will be used by entities involved in the export of US goods and services, to provide Ex-Im Bank with the information necessary to obtain legislatively required assurance of repayment and fulfills other statutory requirements.

- 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.

This form will be completed and will be used by entities involved in the export of US goods and services.

- 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.

The majority of these forms are received electronically, together with electronic

attachments of supporting credit information. Ex-Im Bank processing is fully electronic and concludes with the issuance of a document sent electronically to the applicant. Technology accelerates the entire process but does not necessarily reduce the amount or substance in credit information required from the applicant. Accessibility to policy documents is considerably improved for exporters through technology.

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.

All applications are independent of each other; therefore this is no duplication since each application corresponds to a unique insurance product. In circumstances where some information may already be on file at Ex-Im Bank the application includes language allowing the applicant to indicate so.

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

Pursuant to the response in #3 above, the burden to small businesses is reduced largely through unnecessary, back-and-forth transmission of paper or hard copy documents whose timeliness through the mail system is inconsistent, untimely, and could be lost in transit.

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.

This transaction type requires one submission per 12-month period. Therefore, the frequency of collection is not burdensome to applicants. Technically, Ex-Im Bank could not lengthen the period to longer than 15 month intervals in order to maintain accurate statistics for reporting to other government agencies and towards annual program budget allocations.

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.

This 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.

No comments were received.

- 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 officers and employees are subject to the Trade Secrets Act, 19 USC Sec 1905, which requires Ex-Im Bank to protect confidential business and commercial 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;	500
the frequency of response;	As needed
*annual hour burden; and	250

*an explanation of how the burden was estimated.

* Each time an exporter seeks to obtain Ex-Im Bank short-term insurance for a single-buyer export sale.

The estimated burden was calculated using an average of ½ hours for each submission, including the completion of an electronic form and accumulating, then attaching electronic credit and other supporting information.

- 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:

Responses per year	500
Reviewing time per year	500
Average Wages per hour	\$50
Average cost per year (time * wages)	\$25,000
Benefits and overhead	100%
Total Government Cost	\$25,000

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.

The Export Import Bank of the United States is updating all citations concerning the non-procurement debarment and suspension regulations.

The Short-Term Multi-Buyer Export Credit Insurance Policy Application currently states:

Old Citation

The term “Covered Transaction” shall have the meaning set forth in the Ex-Im Bank Debarment and Suspension Regulations at 12 C.F.R. Part 413 (Regulations).

New Citation

The term "Covered Transaction" shall have the meaning set forth in the Ex-Im Bank Debarment Regulations. "Debarment Regulations" shall mean, collectively: (1) the Export-Import Bank's Non-procurement Debarment and Suspension regulations, 2 C.F.R. Part 3513, adopting by reference, the OMB Guidelines to Agencies on Government wide

Debarment and Suspension (Non-procurement), 2 C.F.R. Part 180; and (2) the Debarment, Suspension, and Ineligibility provisions of the Federal Acquisition Regulation, 48 C.F.R.

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.

Statistical methods are not used in this information collection.