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:

- Addition of DUNS Number if available
 The Office of Management and Budget has requested OPIC collect DUNS
 numbers for clients who receive financing from OPIC. Whereas only a small
 percentage of applicants for financing actually make it through the process to
 receive financing, OPIC needs a form to collect this data. The provision of this
 data is optional for the applicant at this stage.
- 2. On an annual basis, OPIC receives approximately 190 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. OPIC collects this information in a standard format using an online electronic system to minimize burden on the applicant.
- 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 are asked of all applicants; whether they are large or small, require only brief answers.
- 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 of the proposed projects, thereby reducing the

productivity and administrative efficiency of the finance program and the policy 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.

As OPIC has not changed the form in any significant manner except to add a section that is optional, OPIC Finance did not undertake a review of the time it takes to complete the form.

- 8. No payments and gifts are offered to respondents.
- 9. 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.
- 10. Not applicable. None of the questions on this form are of a sensitive nature.
- 11. The estimated hour burden of collecting this information is as follows:

190 respondents

x 1 per respondent

190 total annual responses

x (1.95 hours per average respondent)

370.5 respondent hours

x \$80 for personnel, record-keeping, overhead

\$29,640 total cost to respondents

Annual reporting is not required. Information is only collected once per application.

At this stage, OPIC is requesting an extension of its application form in its current format, with the addition of one optional item. During the last submission when the form was revised, the following methodology was used in order to determine the burden to respondents in filling out the newly revised OPIC finance application (OPIC-115): 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).

- 12. 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) OPIC no longer accepts paper submission of finance applications, so there are no non-labor costs to OPIC clients completing this information.
- 13. The estimated annualized cost to the Federal government is 190 responses: 0.5 hours for the 100 Part I only applications; and 2.08 hours for the 90 completed applications. Using an average cost of \$50.41 (a GS-14/1) to review these applications, the total cost to the Federal government is estimated to be $$11,957.25{(100 \times 0.5 \times $50.00)} + (90 \times 2.08 \times $187.20)}$.
- 14. The number of total respondents (190) is based on the approximate number of companies formally applying for OPIC finance in Fiscal Year 2010. The time for OPIC to review the form has stayed the same because the answer to the newly added optional question is not reviewed at this stage of the approval process.
- 15. Not applicable. Information provided in the application is not published or made public in any way.

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