

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 (Structured Finance and Small and Medium Enterprise Finance). The information provided is reviewed by OPIC finance officers to determine a sponsor's qualifications for receiving OPIC financial assistance. The information collected through the OPIC-129 form enables OPIC to comply with its congressional mandate to manage the program in a prudent manner.

Proposed amendments to OPIC-129 form:

- Create an on-line "smart form"
At present, the on-line OPIC-129 is a series of fields similar to a "fillable PDF" that looks very much like the original paper form. The new on-line version of the form will have programming that will guide the sponsor through the form, showing the sponsor only those questions that are relevant to them. OPIC believes that this will be a much more user-friendly and efficient format.
 - Provide information only about the project sponsor
Previously, the OPIC-129 collected a) information about the sponsor of the project, b) certain information about the project itself and c) certain policy information. The updated OPIC-129 is significantly shorter and focuses only on information about the sponsor. The project and policy information will now only be covered in the revised OPIC-115 and 248 forms.¹ This updated OPIC-129 will save time and cost for project sponsors. It will also reduce the overall amount of paperwork because only one OPIC-115 and 248 form is completed per project, while there may be multiple project sponsors involved in a project, each of whom must complete an OPIC-129 form.
2. On an annual basis, OPIC receives approximately 700 completed OPIC-129 forms. The information provided in the OPIC-129 is used by OPIC as a part of the Character Risk Due Diligence/background check procedure (similar to a commercial bank's Know Your Customer procedure) that it performs on each party that has a significant relationship (5% or more beneficial ownership, provision of significant credit support, significant managerial relationship) to the projects that OPIC finances.

¹ Please see concurrent submission of OPIC-115 and OPIC-248.

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 and technical re-engineering on all business practices and information submissions to minimize the burden and reduce expenses for both the applicants and OPIC. The next stage of this process is to allow the applicant to complete all forms on-line, link forms so that information provided in one form will auto-populate certain sections of other forms, and make forms into “smart forms” so that applicants will only see questions that are applicable to them. 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. OPIC’s applicants include both large and small businesses. The same questions are asked of all applicants and require only brief answers. As discussed above, significant efforts are being made to make questions clearer and information input easier, reducing the burden on the applicant.
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 November 29, 2011. OPIC did not receive any public comments in response to this notice. The second Federal Register Notice is expected to be published on January 30, 2012.

Several experienced finance program staff who have assisted many applicants as they completed the OPIC-129 provided input on how to make the form easier for applicants to understand and complete.

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-129 form with the phrase, “Confidential Commercial Information”.

Client information contained in this questionnaire will be deemed designated as confidential commercial information 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:

700 respondents

x 1 per respondent

700 total annual responses

x (3.00 hours per average respondent)

2100 respondent hours

x \$75/hour for personnel, record-keeping, overhead

\$157,500.00 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-129), the following methodology was used: The previous estimate for filling out OPIC-129 was 5 hours. Because the amount of information requested has been reduced and the input of the answers should be made easier by the design of the input fields, the estimated time to complete the form has been reduced to 3 hours.

13. The estimated annualized cost to respondents is as follows:

(a) Total capital and start-up costs: \$0

(b) Total operation and maintenance costs: \$0.

All costs associated with the form are part of the normal cost of doing business. Since all submissions will be electronic and stored on OPIC's secure servers, there will be no postage or storage costs.

14. The estimated annualized cost to the Federal government is 700 responses x 2 hours. 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 \$70,574 (700 x 2.0 x \$50.41).

15. The number of total respondents is based on the approximate number of companies applying for OPIC finance each year and how many sponsors are involved in a given project.

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.

B. Timing of Form Effectiveness

OPIC's IT department is scheduled to complete the development of the "smart form" platform by Fall 2012, so that is the date that OPIC would expect to begin using the revised OPIC-129. However, this date may be delayed for unforeseen reasons, so OPIC asks that OMB consider the current OPIC-129 to be effective until OPIC notifies OMB that the revised on-line OPIC-129 platform is ready for use by applicants.

PA V. L. H. L. *1/30/12*