

## 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. Section 239(h) [Title 22 USC 2199(h)] requires OPIC to monitor developmental effects, stating: "...the Corporation shall prepare and maintain for each investment project it insures, finances, or reinsures a developmental impact profile consisting of data appropriate to measure the project and actual effects of such project on development." In addition, Section 240A of the Foreign Assistance Act of 1961 [Title 22 USC 2200(a)] requires OPIC to "submit to the Congress a complete and detailed report of its operations during such fiscal year. Such report shall include (1) an assessment, based upon the developmental impact profiles required by section 239(h), of the economic and social development impact and benefits of the projects..."

This application is sent to U.S. companies requesting financing or political risk insurance from OPIC. The information requested is required to determine the expected effects of proposed projects on the U.S. economy and employment, as well as the effects on the environment, economic development, and worker rights abroad. The information collected through the OPIC-248 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.

Increased efficiencies proposed in Form OPIC-248 form:

- Improved Application Efficiency  
First, Form 248, the OIP Questionnaire ("OIPQ"), has been separated from the Finance Application Form 115 in order to save time for investors. Please see justification for Form 115 for further details on this split. With the new forms, first, Form 115 will be completed, providing 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 Form 248. Second, we have undertaken a thorough review of the language used throughout the application, to make it both more readable and consistent. Third, the new forms are web-based and will tailor questions for each investor according to the specific OPIC product for which they are seeking financing.

- Host Country Development Effects

The new Form 248 reflects the revised development impact questionnaire, which has been streamlined and shortened from the previous questionnaire. Efforts have been undertaken to clarify both the wording of the questions and the format to make the developmental information easier for the applicant to fill out, and easier for OPIC to interpret. As before, we have retained 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. Both sets of questions have been simplified and reduced, which should save time for investors.

2. On an annual basis, approximately 230 applications applications for OPIC products are deemed eligible for further evaluation and are thus referred for policy review and clearance. The information collected is reviewed by policy analysts to determine the expected effects of the projects on the U.S. economy and employment, as well as on the environment, economic development, and worker rights abroad.
3. The new form enables applicants to submit information electronically to minimize the burden and reduce expenses. The use of a web-based application also enables 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. The new smart form takes advantage of web technology to tailor questions for each investor according to the specific OPIC product for which they are seeking financing.
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 projects being considered for OPIC financing or insurance. In addition, wherever relevant, Form 248 will be auto-filled with information from Form 115 which will further reduce the data collection burden on investors.
5. Questions asked of applicants, whether they are large or small, require only brief answers. The burden of collecting information does not vary with the size of the business applying for financing. However, the new form 248 will minimize the data collection burden for OPIC's small business clients because form responses will be auto-filled wherever relevant.
6. OPIC would not be able to fulfill its mandate to screen projects if this information were not collected. If the information were not collected, OPIC could not assess the expected effects of proposed investment projects on the U.S. economy and employment, as well as the effects on the environment, economic development, and worker rights abroad, consistent with OPIC's authorizing legislation.

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 December 1, 2011. OPIC did not receive any public comments in response to this notice. The second Federal Register Notice is expected to be published on February 1, 2012.

In addition to the formal register notice, these forms have been reviewed extensively across various departments within OPIC.

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 248 form with the phrase, "Confidential Commercial 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:  
230 respondents  
x 1 per respondent  
230 total annual responses  
x (2.4 hours per average respondent)  
552 respondent hours  
x \$75 for personnel, record-keeping, overhead  
\$41,400 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 Form 248, the following methodology was used. The estimated average time required to complete the former Form 115 (which included both the Finance Application as well as the OIP questionnaire) was about 3.15 hours. Since the new Form 248 does not include the Finance application, we subtracted 0.75 hours from this time. Therefore, we estimate that the average applicant will spend 2.4 hours completing the new Form 248.

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.
14. The estimated annualized cost to the Federal government is 230 responses x 2.0 hours = 460 hours for the completed Form 248. Using an average hourly cost of \$50.41 (a GS-

14/1) to review these applications, the total annual cost to the Federal government is estimated to be \$23,187 (230 x 2.0 x \$50.41).

15. The number of total respondents (230) is based on the approximate number of companies formally applying for OPIC financing or insurance each year and that are deemed eligible for further evaluation. The bifurcation of the Finance Application (Form 115) and the OIP Questionnaire (Form 248) reduces both the response time and the OPIC review time. Only a subset of the investors who complete Form 115 will go on to complete Form 248. This will translate to a decrease in the overall time that investors will have to work on OPIC forms.
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 OPIC-248. However, this date may be delayed for unforeseen reasons, so OPIC asks that OMB consider the current OPIC 115 to be effective until OPIC notifies OMB that the revised on-line OPIC-115 platform is ready for use by applicants.

 1/20/12