

**SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION
EXPORT-IMPORT BANK OF THE U.S.**

**SMALL BUSINESS MULTIBUYER EXPORT CREDIT INSURANCE POLICY
ENHANCED ASSIGNMENT OF POLICY PROCEEDS, EIB 92-53**

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 US (Ex-Im Bank) pursuant to the Export Import Bank Act of 1945, as amended (12 USC 635, et seq), facilitates the finance of export of U.S. goods and services. By neutralizing the effect of export credit insurance and guarantees offered by foreign governments and by absorbing credit risks that the private sector will not accept, Ex-Im Bank enables U.S. exporters to compete fairly in foreign markets on the basis of price and product. This collection of information is used by exporters to convey legal rights to, and describe the duties and obligations that have to be met by their financial institution lender in order to share insurance policy proceeds from Ex-Im Bank approved insurance claims,

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 form represents the exporter's directive to Ex-Im Bank to whom and where

the insurance proceeds should be sent, and also describes the duties and obligations that have to be met by the financial institution in order to share in the policy proceeds. The form is typically part of the documentation required by financial institution lenders in order to provide financing of an exporter's foreign accounts receivable. Foreign accounts receivable insured by Ex-Im Bank represent stronger collateral to secure the financing. By recording which policyholders have completed this form, Ex-Im Bank is able to determine how many of its exporter policyholders require Ex-Im Bank insurance policies to support lender financing.

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 form is downloaded from Ex-Im Bank's website through the "Applications and Forms portal" and processed manually at Ex-Im Bank. Once signed by the financial institution and the exporter, and received and executed (signed) by Ex-Im Bank, the executed hardcopies are returned by mail to the lender and exporter for their records. Electronic (online) confirmation is sent to both parties. Policy documents are electronically updated and can be viewed online to show the lender as "assignee" to the policy. Financial institutions can view documents and policy activity online for all of their Ex-Im Bank insurance policies on which they are assignees.

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.

There is no duplication of information submission because each form corresponds to a unique insurance request.

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

The form requires minimal data entry which includes the date, policy number, contact name, address and signature from both the exporter and lender.

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 the form, there could be disputes between the exporter and its financial institution lender as to which party should receive insurance proceeds

Additionally, without the form, which describes the duties and obligations of both the financial institution lender and Ex-Im Bank with regard to payment of policy proceeds, there could be disputes regarding the terms of payment to the financial institution.

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.

These collections are consistent with guidelines in 5 CFR 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, 18 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; 110
 - *the frequency of response; annually for an enhanced assignment
 - *annual hour burden; 15 minutes
 - and
 - *an explanation of how the burden was estimated. The time spent includes risk assessment (for enhanced assignments only), otherwise the process involves electronic transaction processing to record the assignment and re-issue policy declarations showing the addition of the assignee and finally document management scanning.
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 (zero)

- a. Provide estimates of annualized costs to the Federal government.

Reviewing Time	1 hour
Responses/year	110
Review time/year	110 hours
Avg Wages/hr	\$30.25
Avg wage/year	\$3,327.5
Benefits & Overhead	28%
Total Government Cost	\$4,259.20

14. 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

15. 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

16. Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-1.

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. When Item 17 on OMB Form 83-1 is checked, “Yes” the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

Statistical methods are not used in this information collection.