

**SUPPORTING STATEMENT
PART A
FOR PAPERWORK REDUCTION ACT SUBMISSION 3048-XXX
SURVEY EIB 14-01**

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 *Charter of the Export-Import Bank of the United States*, as amended through P.L. 112-122, May 30, 2012, cited as the Export-Import Bank Act of 1945, as amended, seeks to focus on encouraging the participation of small business in international commerce. Specifically, the following sections of the Bank's charter apply to this collection of data:

- **Sec. 2(b)(1)(E)(i)(I).** It is further the policy of the United States to encourage the participation of small business in international commerce.
- **Sec. 2(b)(1)(E)(i)(II).** In exercising its authority, the Bank shall develop a program which gives fair consideration to making loans and providing guarantees for the export of goods and services by small businesses.
- **Sec. 2(b)(1)(E)(ii).** It is further the policy of the United States that the Bank shall give due recognition to the policy stated in section 2(a) of the Small Business Act that "the Government should aid, counsel, assist, and protect, insofar as is possible, the interests of small business concerns in order to preserve free competitive enterprise."
- **Sec. 2(b)(1)(E)(v).** To assure that the purposes of clauses (i) and (ii) of this subparagraph are carried out, the Bank shall make available, from the aggregate loan, guarantee, and insurance authority available to it, an amount to finance exports directly by small business concerns (as defined under section 3 of the Small Business Act) which shall be not less than 20

percent of such authority for each fiscal year. From the amount made available under the preceding sentence, it shall be a goal of the Bank to increase the amount made available to finance exports directly by small business concerns referred to in section 3(i)(1).

- **Sec. 2(b)(1)(E)(vi).** The Bank shall utilize the amount set aside pursuant to clause (v) of this subparagraph to offer financing for small business exports on terms which are fully competitive with regard to interest rates and with regard to the portion of financing which may be provided, guaranteed, or insured. Financing under this clause (vi) shall be available without regard to whether financing for the particular transaction was disapproved by any other Federal agency.

Further, Section 1 of Executive Order 13534, also known as President Obama's National Export Initiative directs that: "The National Export Initiative (NEI) shall be an Administration initiative to improve conditions that directly affect the private sector's ability to export. The NEI will help meet my Administration's goal of doubling exports over the next 5 years by working to remove trade barriers abroad, by helping firms -- especially small businesses -- overcome the hurdles to entering new export markets, by assisting with financing, and in general by pursuing a Government-wide approach to export advocacy abroad, among other steps."

Additionally, Section 1 of Executive Order 13571 of April 27, 2011—Streamlining Service Delivery and Improving Customer Service—states: "The public deserves competent, efficient, and responsive service from the Federal Government. Executive departments and agencies (agencies) must continuously evaluate their performance in meeting this standard and work to improve it. To this end, Executive Order 12862 (Setting Customer Service Standards), issued on September 11, 1993, requires agencies that provide significant services directly to the public to identify and survey their customers, establish service standards and track performance against those standards, and benchmark customer service performance against the best in business."

Therefore, due to the multifaceted priority of small business to Ex-Im Bank and to the administration, Ex-Im Bank seeks to survey its small business exporter customers to identify potential service issues and service improvement opportunities. Customers in this instance are small business exporters who have purchased trade credit insurance from Ex-Im Bank in a fiscal year.

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 is a new collection. The survey results will be used by various internal constituents to inform potential service issues and service improvement

opportunities. The information will be shared broadly, internally, and possibly with external stakeholders who inquire about Ex-Im Bank's work with small business exporters. The information will provide Ex-Im Bank with the information necessary to pinpoint areas where we may enhance our work with small businesses.

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.

This survey will be administered electronically, via e-mail. Electronic administration of this survey was chosen to help to keep costs low.

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.

This is a new collection of data from small business exporters who purchased trade credit insurance from Ex-Im Bank. No customer feedback data exists for these particular customers at present.

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

This collection of data will impact Ex-Im Bank's approach to and understanding of its small businesses customers. The survey will be a voice for small businesses who have navigated processes and communication channels at Ex-Im in order to grow their export business. To minimize burden, the survey is voluntary, administered via e-mail, answerable online, and will take less than 10 minutes to complete.

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.

Not applicable.

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.

Not applicable.

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. No information of sensitive nature is requested.

12. Provide estimates of the hour burden of the collection of information. The statement should include

The number of respondents:	1,808
Estimated time per respondents:	10 minutes
The frequency of response:	Annually
Annual hour burden:	301 total hours

The estimated burden was calculated using an average of 10 minutes for each survey submission (per policyholder/exporter per year on average). This includes the time to review instructions, search existing data resources, gather the data needed, and complete the information collection.

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 response:	5 minutes
Responses per year:	1,808
Reviewing time per year:	150.7 hours
Average Wages per hour:	\$42.50
Average cost per year:	
(time * wages)	\$6,403
Benefits and overhead:	20%
Total Government Cost:	\$7,684

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.

No complex analytical techniques will be used in the tabulation of the data. Relevant highlights from the survey will be published internally and externally. The following schedule outlines the project management plan. The plan is subject to change based on variables that may be beyond Ex-Im Bank's control.

OMB clearance processes: November 15, 2013-February 15, 2014
Survey administration to predetermined sample: February 15, 2014-March 8, 2014

Survey analysis and tabulation: March 9, 2014-March 17, 2014

Internal, group presentations of data to senior executives and various bank divisions: March 17, 2014-April 4, 2014

Internal, published presentations of survey highlights to employees via Intranet and other internal communication channels: April 7-September 30, 2013

Publication of survey highlights at Ex-Im Bank annual conference April 24-25, 2014

Publication of survey highlights on ExIm.gov April 25, 2014

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.