

SUPPORTING STATEMENT

FOR PAPERWORK REDUCTION ACT SUBMISSION

OMB Number: 3048-0016

Application for Issuing Bank Credit Limit (EIB 92-36)

Revised 07/21/2014

Part 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 hard copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information, or you may provide a valid URL link or paste the applicable section. Please limit pasted text to no longer than 3 pages. Specify the review type of the collection (new, revision, extension, reinstatement with change, reinstatement without change). If revised, briefly specify the changes. If a rulemaking is involved, make note of the sections or changed sections, if applicable.

The Export Import Bank of the United States (Ex-Im Bank) pursuant to the Export Import Bank Act of 1945, as amended (12 USC 635, et seq)¹, 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 necessary, pursuant to 12 USC Sec. 635 (a) (1), to determine eligibility of the applicant for Ex-Im Bank assistance.

¹ [<http://www.gpo.gov/fdsys/granule/USCODE-2011-title12/USCODE-2011-title12-chap6A-subchapI-sec635>]

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 form is used by a financial institution (or broker acting on its behalf) in order to obtain approval for coverage of a specific issuing bank. The information received provides Ex-Im Bank staff with the information necessary to make a determination of the eligibility of the issuing bank and transaction for Ex-Im Bank assistance under its insurance program.

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.

Ex-Im Bank is accepting this application online and in hard copy form (e.g., via mail or fax). The online application offers the U.S. exporting community the opportunity to electronically submit and manage an insurance policy, which will reduce the paperwork burden, reduce processing times, and minimize the expense of using mail service.

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.

All applications are independent of independent of each other; therefore there is no duplication. Each application corresponds to a unique insurance product. Should some information already be on file, the application allows the applicant to indicate so.

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

As stated in response to item #3 above, the burden to small businesses is reduced largely through elimination of the unnecessary, back-and-forth transmission of paper documents. Elimination of paper brings consistency, time savings and improved reliability to the process.

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.

Absent the information required in the application form, Ex-Im Bank would be unable to make the necessary judgments to determine eligibility of the applicant. Without those judgments, Ex-Im Bank would not be able to provide the coverage needed by our customers.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:
 - a. requiring respondents to report information to the agency more often than quarterly;
 - b. requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
 - c. requiring respondents to submit more than an original and two copies of any document;
 - d. 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;
 - e. requiring the use of statistical data classification that has not been reviewed and approved by OMB;
 - f. 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

- g. 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.

This collection is 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.

In accordance with 5 CFR 1320.8(d), a 60-day Federal Register notice was published on November 21, 2013 (V79, NO 19, p. 4696). A 30-day notice was published on January 29, 2014 (V78, NO 225, p. 69849). There were no public comments.

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 CFR 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 private. 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, including:

The number of respondents	480
The frequency of response	As needed
The annual hour burden	480
An explanation of how the	From time to time staff completes a "sample" application

burden was estimated.	form for use in system testing, training, etc. The time it takes for staff to fill out the application form is 30 minutes. If the applicant has the requisite credit information at hand, it should take the respondent approximately 30 minutes as well. For burden calculation purposes, we assumed that it would take on average 1 hour for respondents to complete the application. We received, on average over the last three years, 480 applications. Thus, the annual burden rate can be calculated as $480 * 1 = 480$ hours.
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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 year:

Responses per year	480
Reviewing time (hours) per year	480.00
Average wages per hour	\$42.50
Average cost per year (time * wages)	\$20,400.00
Benefits and overhead	20%
Total Government Cost	\$24,480

15. Explain the reasons for any program changes or adjustments reflected in the public burden or government costs.

This request is for an extension of the expiry date of the form, updates to the Certification and Notices section, as well as a new statement explaining Ex-Im Bank's limitation on support for goods subject to trade measures or sanctions.

This submission for re-certification also corrects the "cost to public" figure in the estimates of public burden. The previous submissions have supplied an incorrect estimate, resulting in the appearance of a decrease in public burden costs.

16. 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.

17. 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.

The information collected by this form is required to determine eligibility of the applicant for Ex-Im Bank assistance and will be used for the duration of its certification period (three years from the time of approval).

18. 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

19. Explain each exception to the certification statement identified in the Certification of Paperwork Reduction Act.

There are no exceptions.