

Supporting Statement for Paperwork Reduction Act Submissions
OMB Form 3048-0031
Application for Express Insurance (EIB 10-02)

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 (Ex-Im Bank) pursuant to the Export Import Bank Act of 1945, as amended (12 USC 635, et seq), facilitates the financing of exports 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 produce. 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.

The Export-Import Bank has made a change to the report to have the financial institution provide specific information (industry code, number of employees and annual sales volume) needed to make a determination as to whether or not the exporter meets the SBA's definition of a small business. The financial institution already provides the exporter's name and address. These additional pieces of information will allow Ex-Im Bank to better track the extent to which its support assists U.S. small businesses.

The other change that Ex-Im Bank has made is to require the financial institution to indicate whether the exporter is a minority-owned business, women-owned business and/or veteran-owned business. Although answers to the questions are mandatory, the company may choose any one of the three answers: Yes/No/Decline to Answer. The option of "Decline to Answer" allows a company to consciously decline to answer the specific question should they not wish to provide that information.

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 an exporter (or broker acting on its behalf) in order to obtain approval for coverage of the repayment risk of export sales. The information received provides Ex-Im Bank staff with the information necessary to make a determination of the eligibility of the applicant and the creditworthiness of one of the applicant's foreign buyers for Ex-Im Bank assistance under its programs.

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 expects that the majority of these forms will be received electronically, via the existing on-line application and processing system used for insurance. Ex-Im Bank processing is fully electronic and concludes with the issuance of a document sent electronically to the applicant.

Technology accelerates the entire process but does not necessarily reduce the amount or substance of credit information required from the applicant. Accessibility to policy documents is considerably improved for exporters through technology.

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 each other; therefore there is no duplication since each application corresponds to a unique insurance product. The application allows the applicant to indicate when information is already on file with Ex-Im Bank.

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

Pursuant to the response in #3 above, the burden to small businesses is reduced largely through elimination of the unnecessary, back-and-forth transmission of paper or hard copy documents whose timeliness through the mail system is inconsistent and that could be lost in transit. Additionally, Ex-Im Bank's regional office staff will be assisting the exporters with the application process and will

sometimes enter the application for the customer.

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:
 - *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.

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.

The Bank's notice soliciting public comments was published in Volume 80, No. 40 of the Federal Register on Monday, March 2, 2015. This is an emergency approval request. No comments were received to date.

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 provided 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. The statement should include:

The number of respondents:	500
The frequency of response:	Once per year
Annual hour burden:	125 hours per year

An explanation of how the burden was estimated.

From time to time staff completes a "sample" application form for use in testing, training, etc. The time it takes for staff to fill out the application form is 5 minutes. If the applicant has their credit information at hand, it should take the respondent 5 minutes as well. For burden calculation purposes, we assumed that it would take on average 15 minutes for respondents to complete the application. We expect to receive, on average 500 applications per year. Thus, the annual burden rate can be calculated as $500 * 0.25 = 125.00$ hours.

- 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:	2 hours
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Responses per year:	500
Reviewing time per year:	1,000 hours
Average Wages per hour:	\$42.50
Average cost per year (time * wages)	\$42,500
Benefits and overhead:	20%
Total Government Cost:	\$51,000

- 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.

The revised form requests additional information about sales by affiliates, U.S. content of the product, and foreign buyers. By requesting this information in the application form, Ex-Im Bank will no longer need to separately request additional information from the applicant in order to process the application.

- 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

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 were not used.