

**SUPPORTING STATEMENT  
FOR PAPERWORK REDUCTION ACT SUBMISSION 3048-0021  
FORM EIB 92-30**

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 finance of the export of U.S. goods and services. By neutralizing the effect of export credit insurance 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 635 (a)(1), to determine eligibility of the applicant for Ex-Im Bank assistance or participation.

The Export-Import Bank has made a change to the report to have the insured financial institution provide the industry code (NAICS) associated with each specific export as well as specific information needed to make a determination as to whether or not the exporter meets the SBA's definition of a small business. The insured financial institution already provides a short description of the goods and/or services being exported and the name and address of the exporter. These additional pieces of information will allow Ex-Im Bank to better track what exports it is covering with its insurance policy and the extent to which its support assists U.S. small businesses.

The other change that Ex-Im Bank has made is to require the insured financial institution to indicate whether the exporter is a minority-owned business, women-owned business and/or veteran-owned business. Although answers to the question 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 answer.

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 will be completed by financial institutions to report transactions under the terms of the policy and to provide Ex-Im Bank staff with the information necessary to record customer utilization and manage prospective insurance liability relative to risk premiums received.

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 majority of these forms are received electronically with associated payment of premiums transmitted electronically or by wires sent by financial institutions. Technology is providing considerable burden reduction to both external users/exporters and more so to internal staff at Ex-Im Bank. Since introducing web-based, online shipment reporting and premium payment, progressively larger numbers of financial institutions are making use of this efficiency tool. A secondary benefit to external and internal users is that viewing filed reports is very convenient through the online system.

Ex-Im Bank continues upgrading the reporting module to increase usability and utilization. At the present time, nearly 95% of the total submissions of these forms are being submitted electronically. There remains a minority group of financial institutions who prefer paper submissions.

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 shipment report form corresponds to a unique transactions. In circumstances where information may already be on file at Ex-Im Bank the online system notifies users of the potential duplicate.

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

This online form offers financial institutions the opportunity to electronically report shipments, recording customer utilization and managing prospective insurance liability relative to risk premiums received, which will reduce the paperwork burden and reduce processing times as well as minimize the expense of using mailing services.

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.

Reporting shipments is necessary for Ex-Im Bank to determine compliance with policy rules and regulations. Further, without this information Ex-Im Bank would be unable to assess customer utilization, premiums due, and insurance liability.

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.

Monthly reporting of the shipments is necessary for Ex-Im Bank to assure compliance with policy rules and regulations and to assess customer utilization, premiums due, and insurance liability.

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, 18 U.S.C. Sec. 1905, which requires Ex-Im Bank to protect confidential business and commercial information from disclosure, and 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. The statement should include:

The number of respondents:	215
The frequency of response:	monthly
Annual hour burden:	860 hours

An explanation of how the burden was estimated:

215 respondents times 12 months equals 2,580 responses.

2,580 responses multiplied by 30 minutes per response and divided by 60 minutes per hour equals 1,290 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:	20 Minutes
Responses per year:	2,580
Reviewing time per year:	860 Hours
Average Wages per hour:	\$42.5
Average cost per year:	

(time * wages)	\$36,550.00
Benefits and overhead	20%
Total Government Cost	\$43,860

15. Explain the reasons for any program changes or adjustment in reported items 13 or 14 of OMB form 83-1.

The adjustment in the public time burden is the result of a more conservative estimate of 30 minutes per public user per form, as compared to the 20 minutes estimate previously. The new estimate reflects the most recent experience.

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. Information is not published. Any publishing of information collected is not related to the original purpose of the application.

17. 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

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

No exceptions

**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.