

SUPPORTING STATEMENT FOR APPROVAL

A. Justification

1. Legal authority for this information collection is found in 22 U.S.C. Sections 231, 234(a), 239(d), and 240A of the Foreign Assistance Act (FAA) of 1961, as amended. Potential investors are required to register their intention to apply for insurance prior to making an irrevocable investment in a project. Once the registration is approved, the investor submits the OPIC-52 which provides more detailed information about the project. OPIC must screen each applicant for investment insurance to determine the eligibility for OPIC programs of the investor and the project, and assess the political risks of the project in the host country. The detailed information collected through the OPIC-52 form enables OPIC to comply with its congressional mandate to manage the program in a prudent manner and to ensure that projects that would have significant adverse effects on the U.S. economy and employment do not receive OPIC support.

The information provided by the applicant falls into several areas. First, information concerning the investor is necessary to determine eligibility for OPIC insurance as required by the Foreign Assistance Act.

Second, the proposed investment must be explained in detail so OPIC can determine the amount and type of investment to be covered, as well as the underwriting risks associated with insuring the U.S. investor against losses due to political events.

2. The information collected is used by OPIC insurance directors, officers, and analysts to determine the eligibility of the investor, the project, and the risks associated with underwriting the investment against political events. OPIC collects one response per project. OPIC continues to rely on the material representations provided by the investor in the OPIC-52 in its determinations as to the eligibility and the risks of the project.
3. Improved data processing and management information systems enable OPIC to reduce the burden of tracking and analyzing the information collected on these applications. OPIC has automated the application process to enable applicants to submit the information electronically to minimize the burden and reduce expenses to applicants.
4. OPIC-52 collects three categories of information: 1) information on what type of insurance is sought, 2) information on the particular investment that coverage is sought for, and 3) certifications from the applicant regarding their qualifications for receiving OPIC support. Information on what type of political risk insurance coverage is sought from OPIC is specific to the OPIC application and is not available elsewhere. Information on the particular investment that coverage is sought for may be available within other literature such as business plans, however OPIC has sought to request the

minimum information possible for a sound initial diligence review and the burden on applicants to recall this information in a format that is easily accessible to OPIC officers is relatively low compared to the burden that would be imposed on OPIC officers to search for the information in each individual and different project. Requiring the applicant to input this information also ensures that OPIC officers have the most up to date information and that the information is directly inputted by the applicant rather than being transcribed by the OPIC Officer. Certifications from the applicant include the certification that they are not barred from doing business with the federal government and that they are not party to any pending litigation. While this information might be available in other databases, requiring applicant certification ensures that OPIC is not missing an important piece of information due to a gap in a third party database and provides OPIC recourse against any applicants who are aware of negative information but do not share it with OPIC prior to the approval of their project. To the extent that the information in OPIC-52 is duplicative with OPIC-50, OPIC's Forms Portal will pre-populate the OPIC-52, but still allow applicants to update information as years may pass between the filing of the two forms. Political risk insurance for long-term investments is not available from any other government agency. Because this is a unique government service, the information requested on this form is not duplicated elsewhere in the federal government.

5. The burden of collecting information does not vary with the size of the business applying for insurance. OPIC officers make a special effort, either in person or by telephone, to assist small businesses in completing the application.
6. If the information were not collected, OPIC could not be assured of the eligibility of applicants for political risk insurance, the quality of their projects, or the risks associated with their investments. OPIC would be unable fulfil its mandate to prudently screen projects prior to issuance of insurance. This would result in increased claims against OPIC and additional expense to the federal government.
7. No special circumstances exist that require the information collection to be conducted in a manner inconsistent with the guidelines of the Paperwork Reduction Act and OMB's implementing regulations.
8. The first Federal Register Notice was published on February 2, 2015. OPIC did not receive any public comments in response to this notice. The second Federal Register Notice was published on April 23, 2015.
9. Not applicable. Payments and gifts are not offered to respondents.
10. Investor information contained in this document will be deemed designated as "confidential commercial information" in accordance with OPIC's Freedom of Information Act (FOIA) regulations (22 CFR part 706) and will be treated as confidential to the extent permitted under law. Personal information belonging to an individual will not be released under the FOIA unless the information is already public or if the public interest is greater than the private interest under 5 U.S.C. § 552(b)(6).

11. Not applicable. None of the questions on this form are of a sensitive nature.

12. The estimated burden of collecting this information is as follows:

75	respondents per year
x 1	per respondent
75	total annual responses
x 9	average hours to complete one response
675	total respondent hours
<u>x \$75</u>	per hour for personnel, record-keeping, overhead
\$50,625	total cost to respondents

Annual reporting is not required. Information is only collected once per investment.

13. The estimated annualized cost to respondents is as follows:

Total capital and start-up costs: \$0

Total operation and maintenance costs: \$0.

All costs associated with the form are part of the normal cost of doing business. All submissions will be electronic and there will be no postage costs.

14. The estimated annualized cost to the Federal government is:

75	Total number of responses
x 2	Average hours to review one response
150	Total federal hours
<u>x \$51.43</u>	GS-14/1 hourly rate in DC metro area
\$7,715	Total cost to the Federal government

15. The number of total respondents is based on the approximate number of companies applying for OPIC insurance each year. The total number of submissions is decreased to more accurately reflect the estimated number of forms expected. The decreased time burden and federal government costs are in part due to the decreased number of responses, but primarily due to the incorrect entries by the previous records manager. The increase in cost burden is due to an incorrect entry by the previous records manager.

16. Not applicable. OPIC will not publish this information.

17. Not applicable. The OMB expiration date will be printed on each copy of the form.

18. Not applicable. No exceptions are being requested on the certification statement.