

**SUPPORTING STATEMENT  
PART A  
FOR PAPERWORK REDUCTION ACT SUBMISSION 3048-XXX  
SURVEY EIB 15-XX**

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.

Under Ex-Im Bank's Short and Medium term Guarantee and Insurance programs, exported goods and services must meet established U.S. content requirements with respect to the US origination of a set percent of the total imported goods or services to be eligible for Ex-Im Bank financing and ensure that U.S.-jobs benefit from Ex-Im Bank programs. Under Medium Term and short term transactions, Ex-Im Bank relied upon the exporter's certification of U.S. content. However, the accuracy of exporter self-certification of content was never verified. Ex-Im Bank needs the exporter companies to perform verification due diligence and to advise the Ex-Im Bank's Credit Review & Compliance Division ("CRC") on the existence of internal compliance criteria, compliance monitoring, and the ability of the exporter company to perform compliance verification on potential areas of concern for the U.S. Exporters in reference to Ex-Im Bank's content policy in various short and medium term transactions.

The purpose of this survey is to gain a better understanding of exporter awareness of and concerns about the U.S. content requirements for short- and medium-term programs; and to understand the data, systems, and processes used by exporters to track, verify, and certify U.S. content for exported goods covered by Ex-Im Bank short- and medium-term programs. The survey will be conducted electronically.

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.

The information gathered will be used to evaluate and provide an insight into the veracity of foreign content reporting by the exporters, when the exported goods and services are covered by Ex-Im Bank's U.S. Content Policy, i.e. exporter's procurement practices regarding foreign content verification:

- the methods employed to track the proportion of goods/parts in the exporter products/services produced outside the U.S. versus the U.S. originating goods/parts;
- the costs of these foreign components as compared to the cost of the final exported product;
- the frequency of outsourcing;
- how procurement decisions are made, based on the source of material, component, or labor; and
- how foreign content is reported on the Ex-Im – Exporter Certificate or within the Ex-Im Insurance Policy.

Additionally, the survey will provide guidance on establishing due diligence “best practices” that could/should be employed in the Foreign Content space, coordination of due diligence activities, and how information/lessons learned from due diligence activities can be used to enhance underwriting process.

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, with the invitation to participate communicated 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.

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.

In the absence of this survey the Bank will not be able to obtain valuable feedback from our small business exporter customers and, in consequence, will be less effective in our ability to enhance our work with small businesses.

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.

166.67 hours annually

Calculation basis:

Minutes per respondent:	10 minutes
Approximate No. of respondents:	1000 respondents
Total number of minutes:	10,000 minutes
Converted total number of hours	166.67 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).

.No cost to the public other than in time

14. Provide estimates of annualized costs to the Federal government.

\$4,250 per annum

Calculation basis:

Reviewing time per response:	5 minutes
Responses per year:	1000
Reviewing time per year:	83.3 hours
Average Wages per hour:	\$42.50
Average cost per year:	

(time * wages)	\$3,541.67
Benefits and overhead:	20%
Total Government Cost:	\$4,250

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

This is a new survey that will be the first in the series of annual surveys.

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.

No complex analytical techniques will be used in the tabulation of the data. Survey results will be aggregated and the responses would not be attributable to individual survey participants. Relevant highlights from the survey will be published internally and externally. Response rate data will be included in the publication and all the dependencies in generating the conclusions will be stated. 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: December 1, 2015 - April 1, 2016  
Survey administration to predetermined sample: April 1, 2016 – April 15, 2016  
Survey analysis and tabulation: April 17, 2016 - April 22, 2016  
Internal, group presentations of data to senior executives and various bank divisions: April 25, 2016-April 25, 2016  
Internal, published presentations of survey highlights to employees via Intranet and other internal communication channels: April 26, 2016-September 30, 2016  
Publication of survey highlights at Ex-Im Bank annual conference April 25-26, 2016  
Publication of survey highlights on ExIm.gov April 25, 2016

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