**OPIC 162**

**OMB-3420-0019**

# SUPPORTING STATEMENT FOR APPROVAL

## A. JUSTIFICATION

* 1. The information requested is required to determine the effects of OPIC-assisted projects on the U.S. economy and employment, as well as the effects on the environment and economic development, and worker rights abroad. Section 231 (k)(2) of the Foreign Assistance Act of 1961 as amended, [22 U.S.C. § 2191(k)(2)], requires OPIC to: “Monitor conformance with the representations of the investor on which the Corporation relied in making the determination [to assist the investor].” In addition, section 239(h) [22 U.S.C. § 2199(h)] requires OPIC to monitor developmental effects, stating: “…the Corporation shall prepare and maintain for each investment project it insures, finances, or reinsures a developmental impact profile consisting of data appropriate to measure the project and actual effects of such project on development.”
	2. On an annual basis, OPIC receives approximately 465 Self-Monitoring Questionnaires (“SMQ”) from U.S. investors. The SMQ is used by OPIC’s Office of Investment Policy (“OIP”) as a basis for monitoring the effects of OPIC’s investment and insurance portfolio and for reporting, in the aggregate, the results to Congress. The statutory monitoring and reporting requirements could not be satisfied without the use of the form.
	3. The form is available via the OPIC Forms website. The collection of development information enables OPIC to track data in a consistent manner, improve internal information management procedures and more efficiently respond to each applicant. The SMQ enables applicants to submit information electronically to minimize the burden and reduce expenses. The use of a web-based application also enables valuable definitions, explanations and webpage links available at the click of a mouse that should both facilitate the applicant’s answers and help assure the data submitted accurately reflects the intent of the question asked. The smart form takes advantage of web technology to tailor questions for each investor according to their specific investment. To protect data integrity, the SMQ is required to be completed online. Only in extremely rare instances will permission be granted to submit a paper copy of the SMQ.
	4. The information collected is not duplicated elsewhere. The information is not already available in any other electronic form and would not be requested by another federal agency or lending institution since it relates specifically to OPIC’s programs.
	5. The burden of collecting information does not vary with the size of the business applying for assistance.
	6. Each investor receives only one questionnaire per fiscal year (unless information is collected via an onsite monitoring visit). OPIC would not be able to fulfill its mandate to monitor projects if this information were not collected. If the information were not collected, OPIC could not satisfactorily assess the effects of OPIC-supported projects on the U.S. economy and employment, as well as the effects on the environment, economic development, and worker rights abroad.
	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 or OMB’s implementing regulations.
	8. The first Federal Register Notice soliciting public comment of this form was published on February 2, 2016. OPIC did not receive any public comments in response to this notice. The second Federal Register Notice was published on April 8, 2016.
	9. No payments or gifts are offered to respondents.
	10. Client information contained in this questionnaire will be deemed designated as privileged or confidential 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 FOIA.
	11. Not applicable. None of the questions on this form are of a sensitive nature.
	12. The estimated public burden of collecting this information is as follows:

 465 respondents

 x 1 per respondents

 465 total annual responses

 x 4.7 average hours to complete one response

 2,186 respondent hours

 x $75 for personnel, record-keeping, overhead

$163,913 Total Cost to Respondents

There is a slight increase in the public burden due to an increase in the average hours needed to complete OPIC 162.

* 1. The estimated annualized cost to respondent is as follows:

 Total capital and start-up costs: $0

 Total operation and maintenance cost: $0

 All costs associated with this form are part of the normal cost of doing business.

* 1. The estimated annualized cost to the Federal government is as follows.

 465 respondents

 x 1 per respondents

 465 total annual responses

 x 2 average hours to review one response

 930 federal hours

 X $52.17 GS-14/1 (DCB) hourly wage

 $48,518 Total Cost to Federal Government

There is a slight increase in the cost to the Federal government due to an increase in the GS scale.

* 1. The number of total respondents (465) is based on the approximate number of SMQs requested annually by OPIC insurance, finance, and investment funds clients.

The estimated number of respondent hours required has changed from 4.0 to 4.7 due to the proposed changes to OPIC 162. These changes clarify existing questions, incorporate sector-specific development impact questions, and eliminate ineffective questions in an effort to harmonize development impact indicators with other Development Finance Institutions (“DFIs”). OPIC is a signatory to a “Memorandum of Understanding” with 25 partnering DFIs to harmonize development impact metrics where possible. The goal of this effort is to reduce the reporting burden on clients that receive financing from multiple DFIs and to instill best practices in the collection and the reporting on OPIC’s developmental impacts. Overall these changes have resulted in an increased number of questions and time burden. However, to minimize the reporting burden on respondents, OPIC has designed OPIC- 162 as an electronic form with questions populating only if they relate to a project.

* 1. Not applicable. Information provided in the application is not published or made public in any way.
	2. Not applicable. The OMB expiration date will be printed on each copy of the form.
	3. Not applicable. No exceptions are being requested on the certification statement.