

Supporting Statement for Paperwork Reduction Act Submissions

EIB-12-02 CGF Disbursement Approval Requests

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 export 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 product. This collection of information is necessary, pursuant to 12 USC Sec. 635 (a) (1), to determine eligibility of the export for Ex-Im Bank assistance.

This form will enable Ex-Im Bank to identify the specific details of the export transaction. These details are necessary for determining the eligibility of disbursements for approval.

Previously there were no forms to collect this disbursement information. Hardcopy commercial documents and our Form of Exporter's Certificate (OMB 3048-0043) were submitted for Ex-Im Bank to retrieve the information. This process changed in 2001 for the MT MGA to begin collecting the information electronically and discontinue the need for hardcopies to be submitted to Ex-Im Bank. In 2012 Ex-Im Bank decided to change the computer program that the electronic collection process was using and to add the CGF program to the electronic process. Therefore, we designed the various screens necessary to collect the disbursement information under the new computer program and are submitting them to OMB for approval.

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.

Ex-Im Bank staff review this information to assist in determining that each disbursement under a Credit Guarantee Facility meets all of the terms and conditions for approval.

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 form can only be submitted electronically.

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 export transactions are independent of each other; there is no duplication since each disbursement request corresponds to a unique set of disbursement documents.

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

Not applicable.

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.

Without the collection of this information, a possible result would be a disbursement against ineligible goods and services which does not conform with Ex-Im Bank requirements or USG restrictions.

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 60 day notice was published in the Federal Register, Document Citation 81 FR 13366 on March 14, 2016 on pages 13366-13367. The public comment period expired on May 13, 2016; no comments were received.

The 30 day notice was published in the Federal Register, Document Citation 81 FR 35013 on June 01, 2016 on pages 35013-35014. The public comment period expired on August 01, 2016; 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 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 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.

12. Provide estimates of the hour burden of the collection of information. The statement should include:

The number of respondents: 50
Time to Complete: 60 minutes
The frequency of response: **Annual**
Total number of responses received 50
Annual hour burden; and 50 Hours
An explanation of how the burden was estimated: **Working with our customers, we determined that it would take on average 60 minutes to complete the disbursement request.**

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: 30 minute
Responses per year: 50
Reviewing time per year: 25 hours
Average Wages per hour: \$42.50
Average cost per year: \$1,062.50
(time * wages)
Benefits and overhead: 20%
Total Government Cost: \$1,275.00

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

Not applicable.

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.

- 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.

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 are not used in this information collection.

1. Describe (including numerical estimate) the potential respondent universe and any sampling or other respondent section methods to be used.

Not applicable.

2. Describe the procedures used for the collection of information including:
 - *Statistical methodology for stratification and sample selection,
 - *Estimation procedure,
 - *Degree of accuracy needed for the purpose described in the justification,
 - *Unusual problems requiring specialized sampling procedures, and
 - *Any use of periodic (less frequent than annual) data collection cycles to reduce burden.

Not applicable.

3. Describe methods to maximize response rated and to deal with issues of non-response.

Not applicable.

4. Describe any tests of procedures or methods to be undertaken.

Not applicable.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

Not applicable.

Additional Information needed for submission to OMB

Does this Information Collection contain surveys, censuses, or employ statistical methods? (Yes or No)

If yes please explain.

No

Is the Supporting Statement intended to be a Privacy Impact Assessment required by the E-Government Act of 2002? (Yes or No)

If yes please elaborate.

No

Is this Information Collection related to the Affordable Care Act [PPACA, P.L. 111-148 & 111-152]? (Yes or No)

If yes please elaborate

No

Is this Information Collection related to the Dodd-Frank Act [Dodd-Frank Wall Street Reform and Consumer Protection Act, P.L. 111-203]? (Yes or No)

If yes please elaborate

No

Is this Information Collection related to the American Recovery and Reinvestment Act of 2009 (ARRA)? (Yes or No)

If yes please elaborate

No

What percentage of the respondents are identified as Small Business?

0%

What percentage of the respondents will file electronically?

100%