SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION 3048-0017
FORM EIB 92-29

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

Part 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 complete 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 sale for Ex-Im Bank insurance coverage.

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 form the current collection.

   The “Report of Premiums Payable for Exporters Only” form is used by exporters to report and pay premiums on insured shipments to various foreign buyers under the terms of the policy and to certify that premiums have been correctly computed and remitted. The “Report of Premiums Payable for Exporters Only” is used by EXIM to determine the eligibility of the shipment(s) and to calculate the premium due to EXIM Bank for its support of the shipment(s) under its insurance program.

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.

EXIM Bank is currently accepting this report online and in hard copy format (e.g., via mail or fax). The online reporting offers the U.S. exporting community the opportunity to electronically submit information on their export sales and pay the associated premiums. This online approach reduces the paperwork burden, reduces processing time, and minimizes the expense of using mail service.

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 shipment reports are independent of each other; therefore there is no duplication since each report corresponds to a specific shipment occurring during a specific month. Should some information already be with EXIM Bank, the online form is pre-populated with the relevant information.

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

   Pursuant to the response in #3 above, the burden to small businesses is reduced largely through minimizing the need for unnecessary, back-and-forth transmission of paper or hard copy document whose timeliness through the mail system is inconsistent, untimely and could be lost.

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.

   Absent the information required in the application form, Ex-Im Bank would be unable to make the necessary judgments to determine eligibility of the applicant. Without those judgments, Ex-Im Bank would not be able to provide the coverage needed by our customers.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

   a. requiring respondents to report information to the agency more often than quarterly;
   b. requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
   c. requiring respondents to submit more than an original and two copies of any document;
   d. 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;
   e. requiring the use of statistical data classification that has not been reviewed and approved by OMB;

f. 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
g. 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 CRF 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.

   A request for comments (60 days) was published October 26, 2016, Vol. 81, No. 207, Federal Register, page 74429. A request for comments (30 days) was published January 10, 2017, Vol. 82, No.6, Federal Register, page 2977. No comments have been received. All application forms and revisions thereto are discussed with potential users and staff to determine necessity, practicality and acceptability.

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 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, including:

The number of respondents	2,200

The frequency of response	Monthly
The annual hour burden	6,600 hours
An explanation of how the burden was estimated.	From time to time staff completes a “sample” application form for use in system testing, training, etc. The time it takes for staff to fill out the application form is 5 minutes. If the applicant has their credit information at hand, it should take the respondent 5 minutes as well. For burden calculation purposes, we assumed that it would take on average 15 minutes for respondents to complete the application. We receive, on average over the last four years, 26,400 shipment reports (2,200 respondents * 12 months) per year. Thus, the annual burden rate can be calculated as 26,400 * 15 minutes = 6,600 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 year:

Responses per year	26,400
Reviewing time (hours) per year	0.25
Average wages per hour	$42.50
Average cost per year (time * wages)	$280,500
Benefits and overhead	20.00%
Total Government Cost	$336,600

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

    The expected number of respondents has been updated.

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.

Part B. – Collection of Information Employing Statistical Methods

1. 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.

    Not applicable.