

SUPPORTING STATEMENT FOR APPROVAL

A. Justification

1. Legal authority for this information collection is found in 22 U.S.C, Section 234 (d) of the Foreign Assistance Act (FAA) of 1961, as amended. This application is sent to U.S. companies and individuals requesting financing under OPIC's finance program (Structured Finance and Small and Medium Enterprise Finance). The information provided is reviewed by OPIC finance officers to determine a sponsor's qualifications for receiving OPIC financial assistance. The information collected through the OPIC-129 form enables OPIC to comply with its congressional mandate to manage the program in a prudent manner.

Proposed amendments to OPIC-129:

- Form Layout. The form has been revised to update the electronic input fields in a manner that is consistent with new programming at OPIC. The form will include limited drop-down menus tailored to the specific applicant.
 - Scope of Form. OPIC-129 is part of a robust due diligence process that includes access to electronic databases. Questions applicable to the applicant's affiliates and officers of affiliates have been limited in scope and certain questions have been deleted in order to increase the efficiency of searches run in electronic databases. The search tools in electronic databases continue to become more powerful and the changes to the OPIC-129 pass those efficiencies on to the applicant.
2. On an annual basis, it is anticipated that the proposed amendments will reduce inefficiencies with the completion and review of the OPIC-129 . The information provided in the OPIC-129 is used by OPIC as a part of the Character Risk Due Diligence/background check procedure (similar to a commercial bank's Know Your Customer procedure) that it performs on each party that has a significant relationship (10% or more beneficial ownership, provision of significant credit support, significant managerial relationship) to the projects that OPIC finances.
 3. Using a standard form, the collection of information enables OPIC to "log" and track all applicant data in a consistent manner, improve internal information management procedures and more efficiently respond to each applicant. The agency is performing business process and technical re-engineering on all business practices and information submissions to minimize the burden and reduce expenses for both the applicants and OPIC. Through OPIC's internal system the applicant can complete the forms on-line, which links to other OPIC forms so that information provided in one form will auto-populate certain sections of other forms, and make forms into "smart forms" so that applicants will only see

questions that are applicable to them. The use of a web-based application enables valuable pop-up definitions and explanations and webpage links that both facilitate the applicant's answers and help assure the data submitted accurately reflects the intent of the question asked.

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 is applicable solely to OPIC's finance program.
5. OPIC's applicants include both large and small businesses. The same questions are asked of all applicants and require only brief answers. Significant efforts have been made to make questions clearer and information input easier, reducing the burden on the applicant.
6. Without a form to collect the information, the amount of staff time needed to gather the requisite information would be significantly greater and would result in multiple requests for information from applicants. This would reduce the amount of time that could be devoted to credit underwriting, marketing OPIC programs and analyzing the monitored projects, thereby reducing the productivity and administrative efficiency of the finance program.
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 June 15, 2015. OPIC did not receive any public comments in response to this notice. The second Federal Register Notice is scheduled for publication on August 18, 2015.

Several experienced finance program staff, including those who manage the due diligence review process, as well as those who have assisted many applicants as they completed the OPIC-129 provided input on the proposed changes. In making these changes, OPIC staff also had discussions with relevant representatives of certain U.S. governmental agencies (MCC, Exim, SBA), international organizations (IFC and EBRD), and a commercial bank (Citibank) to compare notes regarding their due diligence procedures.

9. No payments and gifts are offered to respondents.
10. Client information contained in this questionnaire 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 FOIA. 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:

630 respondents
x 1 per respondent
630 total annual responses
x 3.00 hours per average respondent
1890 respondent hours
x \$75/hour for personnel, record-keeping, overhead
\$141,750.00 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:

- (a) Total capital and start-up costs: \$0
(b) Total operation and maintenance costs: \$0.

All costs associated with the form are part of the normal cost of doing business. Since all submissions will be electronic and stored on OPIC's secure servers, there will be no postage or storage costs.

14. The estimated annualized cost to the Federal government is 630 responses x 2 hours. Using an average cost of \$51.43 (a GS-14/1) to review these applications, the total cost to the Federal government is estimated to be \$64,801.80 (630 x 2.0 x \$51.43).

15. The number of total respondents is based on the approximate number of projects applying for OPIC finance program support each year and the average number of sponsors involved in a given project.

16. Not applicable. Information provided in the application is not published or made public in any way.

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

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

B. Timing of Form Effectiveness

OPIC would expect to begin using the revised OPIC-129 by the end of 2015, which allows time for the IT department to upload the form using its latest software programming. However, this date may be delayed for unforeseen reasons, so OPIC asks that OMB consider the current OPIC-129 to be effective until OPIC notifies OMB that the revised on-line OPIC-129 platform is ready for use by applicants.