

## Supporting Statement for Paperwork Reduction Act Submissions

### EIB 11-01 “Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery”

#### 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

#### 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.

Executive Order 12862 directs Federal agencies to provide service to the public that matches or exceeds the best service available in the private sector. In order to work continuously to ensure that our programs are effective and meet our customers’ needs, Export-Import Bank of the United States (hereafter “the Agency”) seeks to obtain OMB approval of a generic clearance to collect qualitative feedback on our service delivery. Qualitative feedback collection here means requesting information that provides insights on perceptions and opinions, not conducting statistical surveys that seek quantitative results in order to generalize the conclusions to the population of study.

This collection of information is necessary to enable the Bank to garner customer and stakeholder feedback in an efficient, timely manner, in accordance with our commitment to improving service delivery. The information collected from our customers and stakeholders will help ensure that users have an effective, efficient, and satisfying experience with the Bank’s programs. This feedback will provide insights into customer or stakeholder perceptions, experiences and expectations, and provide an early warning of issues with service, or focus attention on areas where communication, training or changes in operations might improve delivery of products or services. These collections will allow for ongoing, collaborative and actionable communications between the Agency and

its customers and stakeholders.  
directly to the improvement of program

It will also allow feedback to contribute  
management.

2. Indicate how, by whom and for what purpose the information is to be used.

The proposed clearance is designed to allow Ex-Im Bank to survey for the purpose of gaining insights into customers' experiences with the agency and to evaluate product and performance effectiveness. Customers' responses will help to identify potential areas of service improvement and rate overall program experiences.

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.

If appropriate, agencies will collect information electronically and/or use online collaboration tools to reduce burden.

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.

No similar data are gathered or maintained by the Agency or are available from other sources known to the Agency.

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

The electronic submission of the forms reduces the paperwork burden on small businesses and processing time for Ex-Im Bank. Paper forms have been used in the past.

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 these types of feedback, the Agency will not have timely information to adjust its services to meet customer needs.

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.

There are no special circumstances. The information collected will be supplied voluntarily and will not be used for statistical purposes.

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.

60 Day Federal Register Notice FR 79 # 52 dated 03/18/2014

No comments were received

30 Day Federal Register Notice FR 79 # 107 dated 06/04/2014

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Not applicable. Ex-Im Bank does not provide any payment or gift to respondents.

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, 18 U.S.C. 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.

There are no questions of a sensitive nature included in the questionnaire.

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

**Burden Hours**

Annual Number of Respondents: 3200

Estimated Time per Respondent: 45 minutes

Annual Public Burden Hours:2400 hours

Frequency of Reporting of Use: On occasion

An explanation of how the burden was estimated:

From time to time Ex-Im Bank staff sits down and fill out the form with a sample transaction. Recently, it took staff about 30 minutes to fill out the form.

Presuming that all transaction information is collected together in a transaction file, the claimant should also be able to complete the form in 45 minutes.

Nonetheless, staff assumed that it would take on average 1 hour for a claimant to fill out the form. 1hr times 20 applications yields 20 annual hours burden.

12. 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

13. Provide estimates of annualized costs to the Federal government

**Government Expense:**

Reviewing Time per year:1600 Hours

Average Wages per Hour:\$42.50

Average Cost per Year: \$68,000

Benefits and Overhead:20%

Total government Cost:\$81,600

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

Not applicable.

15. 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.

Change in estimating method for the anticipated costs.

16. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Ex-Im Bank is not seeking approval to not display the expiration date.

17. Explain each exception to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-1.

There are no exceptions to the certification statement.

#### 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 collection.