## SUPPORTING STATEMENT FOR APPROVAL

## A. Justification

- 1. Legal authority for this information collection is found in 22 U.S.C, Sections 231 and 234(d) of the Foreign Assistance Act (FAA) of 1961, as amended. This form is completed by both U.S. and non-U.S. individuals (but not companies) who are providing equity or collateral support to projects that may receive debt funding from OPIC's finance program (Structured Finance and Small and Medium Enterprise Finance). The information provided is reviewed by OPIC finance officers to determine if those individuals have sufficient financial wherewithal to meet their expected obligations under the proposed terms of the OPIC financing. The information collected through the OPIC-254 form enables OPIC to comply with its congressional mandate to manage the program in a prudent manner.
- 2. The personal financial statement is considered supporting documentation to the OPIC Application for Project Finance (OPIC 115), but it is only requested if a sponsor of the project being financed is an individual (rather than a corporate entity) and that individual is providing equity investment in or other credit support to the project. OPIC officers generally do not request that individual project sponsors provide personal financial statement information until the officers have already reviewed the application for financing and determined that the application has a high probability of advancing to the underwriting phase.
- 3. This form is provided in a fillable PDF format that the user may complete and return to OPIC via physical transmission or secure electronic transmission. Because of the form's limited usage, OPIC has not yet been able to budget use of IT programming resources to add it to our suite of on-line forms.
- 4. The information to be 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. The sponsors of OPIC-supported projects who may complete this form represent a wide range of nationalities and socioeconomic backgrounds. The same questions are asked of all respondents. The complexity of the answers will depend upon the financial circumstances of the individual respondent. Significant efforts have been made to make the questions clear and efficient, reducing the burden on the respondent.
- 6. Without this information, OPIC would not be able to fully evaluate the ability of individual project sponsors to meet their equity contribution and project guaranty obligations. This

form provides for more in-depth analysis than a standard credit report, and in any case, many sponsors of OPIC projects are from jurisdictions where a personal credit report is not available.

- 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 September 26, 2017 (82 FR 44860). OPIC did not receive any public comments in response to this notice. The second Federal Register Notice was published on December 1, 2017 (82 FR 57012).
- 9. No payments and gifts are offered to respondents.
- 10. OPIC will provide respondents the assurance of confidentiality by labeling the bottom of each page of the OPIC-254 form with the phrase, "Confidential Commercial Information". 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 law. 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: 75 respondents per year x (1 per respondent)
  =75 total annual responses x (1 hour per average respondent)
  =75 respondent hours x (\$75/hour for personnel, record-keeping, overhead)
  \$5,625 total cost to respondents
- 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 75 responses x 1 hour. Using an average cost of \$53.68 (a GS-14/1 DCB) to review these applications, the total cost to the Federal government is estimated to be \$4,026 (75 x 1.0 x \$53.68).
- 15. No adjustments.

- 16. Not applicable. Information provided in the form will not be 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.