

## **Supporting Statement for Paperwork Reduction Act Submissions**

### **EIB 11-03 Used Equipment Questionnaire**

#### **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.
2. The Export Import Bank of the United States (EXIM) 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, EXIM 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 applicant for EXIM assistance.
3. This form will provide EXIM information needed to determine compliance and creditworthiness for transaction requests submitted. Information presented in this form will be considered in the overall evaluation of the transaction, including Export Import Bank's determination of the appropriate term for the transaction.
4. 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.
5. This collection will gather information concerning the eligibility of equipment that has been previously owned or placed into service for support under EXIM's loan, guarantee and insurance programs. To be eligible for EXIM support, used equipment must meet specific criteria.
6. 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.

These forms can be completed electronically and printed for submission.

7. 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 applications are independent of each other; therefore this is no duplication since each application corresponds to a unique financing transaction.

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

The ability to complete the form electronic submission reduces the paperwork burden on small businesses and processing time for EXIM.

9. 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.

Not applicable.

10. 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.

11. 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 Vol. 82, #191 dated 10-4-2017

No comments were received.

30 Day Federal Register Notice Vol. 82, #240 dated 12-15-2017

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

Not applicable.

13. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

EXIM and its officers and employees are subject to the Trade Secrets Act, 19 USC Sec 1905, which requires EXIM to protect confidential business and commercial information from disclosure., as well as, 12 CFR 404.1, which provides that, except as required by law, EXIM will not disclose information provided in confidence without the submitter's consent.

14. 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.

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

- \* number of respondents: 50
- \* frequency of response: Occasionally
- \* annual hour burden: 12.5 hours
- \* an explanation of how the burden was estimated:

From time to time staff complete a "sample" application form for use in system testing, training, etc. The time it takes for staff to fill out the application form is about 15 minutes. For burden calculation purposes, we assumed that it would take on average 15 minutes for respondents to complete the application.

16. 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

17. Provide estimates of annualized costs to the Federal government.

Reviewing time per hour: 15 minutes  
Responses per year: 50  
Reviewing time per year: 12.5 hours  
Average Wages per hour: \$42.50  
Average cost per year: \$531.25  
(time\*wages)  
Benefits and overhead: 20%  
Total Government Cost: \$637.5

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

We have more current information concerning the number of respondents. We have updated the number of respondents and Annual Hour Burden in item 15. This has resulted in a decrease in the total cost to the Agency in item 17.

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

#### 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.