

Supporting Statement for Paperwork Reduction Act Submissions

EIB 92-27 Report of Overdue Accounts Under Short-Term Credit Insurance Policies

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.

Pursuant to the Export-Import Bank Act of 1945, as amended (12 USC 635, et seq.), the Export-Import Bank of the United States (EXIM), facilitates the finance of the export of U.S. goods and services by providing insurance to U.S. exporters or lenders financing U.S. exports. By neutralizing the effect of export credit insurance 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. In the event that a debtor defaults on a transaction insured by EXIM, the insured exporter or lender may seek payment from EXIM by the submission of a claim. This collection of information is necessary, pursuant to 12 USC 635 (a) (1) to report payment default by the borrower.

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

The collection provides EXIM staff with the information necessary to monitor the borrower's payments for exported goods covered under its short term export credit insurance policies.

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 is currently accepting this form in hard copy (via mail or fax), or via e-mail. EXIM also offers our online customers an overdue account feature/ module that allow them to report and manage their overdue accounts.

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.

Each form is independent of the other, i.e., no duplication, since each form corresponds to a unique product. In circumstances when some information may already be on file at EXIM the application includes language allowing the applicant to indicate so.

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

EXIM's new web-based policy management system, EXIM Online, has an overdue account feature/module that allows exporters to report and manage their overdue accounts. Every time an exporter reports shipments in Online, the system prompts them to certify whether they have any overdue accounts as well as update previously reported overdue accounts. Thus Online maintains an exporter's overdue accounts and assists them in managing such accounts – thus providing a useful export credit management tool to U.S. small businesses. These forms will be available on our website in fillable PDF for use by exporters who do not use EXIM Online. These forms may be e-mailed to EXIM.

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 forms, EXIM would be unable to document defaults.

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.

This collection is consistent with guidelines in 5 CFR 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.

60 Day Federal Register Notice FR Vol. 82, #198 dated 10-16-2017

1 comment was received. However, it did not pertain to the form and no action was required.

30 Day Federal Register Notice FR Vol. 83, #13 dated 1-19-2018

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. EXIM 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.

EXIM and its officers and employees are subject to the Trade Secrets Act, 18 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.

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.

The information collection does not ask questions of a sensitive nature.

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

Number of respondents: 745
Frequency of response: Monthly, until completed
Annual hour burden: 186.25 Hours

An explanation of how the burden was estimated:

From time to time EXIM staff sits down and fills out the form with a sample transaction. Recently, it took staff about 10 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 15 minutes. Annually, EXIM receives on average 745 overdue reports. These 745 reports equate to 149 respondents reporting once a month for five months – the average length of time necessary for a default to be cured or a claim to be filed.

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. Estimated annualized cost to the Federal Government:

Reviewing time: 15 Minutes
Responses/year: 745
Review time/year: 186.25 hours
Avg. wages/hour: \$42.5
Avg. wages/year: \$7,915.63
Benefits & overhead: 20%
Total Government cost: \$9,498.75

15. Explain the reasons for any program changes or adjusted reported in items 12 or 14 of OMB Form 83-1.

Not applicable.

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.

The collected information will not be published.

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.

EXIM is not seeking approval to not display the expiration date.

18. 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. Collections of Information Employing Statistical Methods

Statistical methods are not used in this information collection.