

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 OPIC support. The information provided is reviewed by OPIC 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:

- 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 has a robust due diligence process that includes access to electronic databases. Questions applicable to the applicant and its affiliates and officers have been deleted in order to reduce duplicative searches that OPIC conducts through such electronic databases. These search tools provide immediate results, and thus, the OPIC-129 form is only one aspect of the due diligence review. Certain questions that can be addressed through the electronic search engines have been removed from the OPIC-129 form to eliminate duplication.
 - Name of Form. OPIC-129 form will be titled the Personal Information Form.
2. On an annual basis, it is anticipated that the proposed amendments will reduce inefficiencies with the completion and review of the OPIC-129 form and remove duplication of efforts at OPIC. The information provided in the OPIC-129 form 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 reduce 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 for program users. 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 May 3, 2018. OPIC received one set of public comments in response to this notice and made no changes. The second Federal Register Notice will be published on July 11, 2018.

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 form provided input on the proposed changes to the form. In making these changes, OPIC staff previously 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. OPIC provides respondents the assurance of confidentiality by labeling the bottom of each page of the OPIC-129 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 applicable law.

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:

500 respondents

x 1 per respondent

500 total annual responses

x (1.00 hours per average respondent)

500 respondent hours

x \$75/hour for personnel, record-keeping, overhead

\$37,500.00 total cost to respondents

Annual reporting is not required. Information is only collected once per investment. In order to determine the burden to respondents in filling out the revised OPIC finance application (OPIC-129), the following methodology was used: The amount of information requested and the input of the answers will be reduced from the last time the form was amended, and thus the estimated time to complete the form is 1 hour.

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 500 responses x 1 hours. Using an average cost of \$54.91 (a GS-14/1) to review these applications, the total cost to the Federal government is estimated to be \$27,455 (500 x 1.0 x \$54.91).

15. Since the last renewal, OPIC has developed the capability to precisely track the number of applications that it receives. The projected estimate is based on figures from the past three years and includes all of OPIC's business lines.

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.