

**SUPPORTING STATEMENT  
PART A  
FOR PAPERWORK REDUCTION ACT SUBMISSION 3048-0004  
EXIM COMPETITIVENESS REPORT SURVEY EIB 00-02**

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.

Additional Information related to the to the Export Import Bank's privacy policies for **EIB 00-02** collection:

- 1) Is the information collected maintained as part of a system of records?

Information collected by this survey is not maintained in a system of records.

- 2) Does EXIM have a Privacy Impact Assessment (PIA) or System of Records Notice that is applicable to the information collected?

The most recent PIA applicable to the collected information is the EXIM Online (EOL) PIA, dated June 25, 2018. The PIA determined that EOL is not a System of records under the Privacy Act, 5 U.S.C 552a.

- 3) Has the form contained in this information collection request been reviewed by EXIM's privacy office or staff?

Yes, this form has been reviewed by EXIM's privacy office.

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.

The purpose of the proposed Survey is to fulfill a statutory mandate (the Export-Import Bank Act of 1945, as amended, 12 U.S.C. 635) that directs the Export-

Import Bank of the United States (EXIM) to report annually to the U.S. Congress any action taken toward providing export credit programs that are competitive with those offered by official foreign export credit agencies. Section 8A(a)(1) of the Act further stipulates that the annual report on competitiveness should include the results of a survey of U.S. exporters and commercial lending institutions to determine whether their export financing is competitive with that of their foreign counterparts.

2. 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.

EXIM uses the information to report on the competitiveness of EXIM's programs and policies. The Bank has reported on information received from the current collection in the annual Competitiveness Report. Past reports may be found on the Bank's web site at: <http://www.exim.gov/news/reports/competitiveness-reports>. Information will be collected and analyzed by EXIM's Office of Policy Analysis and International Relations which has responsibility for the production of the Competitiveness Report.

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.

Electronic administration of this survey was chosen to help to keep costs low. The Bank will administer the survey on a web site, which will reduce postage costs to Survey respondents, reduce the use of paper by EXIM, and eliminate the need (and associated costs) for duplicate data entry by EXIM as Bank staff can download the data into a useable database. The invitation to take the survey will be sent via e-mail. Electronic administration will also reduce the burden of respondents as the survey will be set up such that respondents only see questions for which they have the requisite background. The online survey further allows respondents to fill out the survey at their own pace as respondents can save answers and return later to complete.

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.

The Survey is conducted annually, as required by EXIM's Congressional mandate. An annual Survey provides a broad enough time horizon to ensure quality responses.

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

This Survey may impact small business. In addition to users of its medium- and long-term programs, this year EXIM will be surveying users of its short-term programs, which are more likely to be small businesses. The Survey will be conducted via an online platform which allows for respondents to only see questions applicable to them. This minimizes the time required to take the survey. Furthermore, the online platform allows for respondents to return to the survey as needed in order to complete their response, which provides additional flexibility.

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.

The Survey is conducted annually, as required by EXIM's Congressional mandate.

Less frequent surveying would diminish the value of the Survey, because the policies of EXIM's foreign competitors are frequently adjusted, and a less frequent survey would not capture reactions to individual programmatic changes.

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.

Not applicable.

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 Notice: Federal Register Citation: Vol.3, No.216 Citation Date: 11/07/2018

30-day Notice: Federal Register Citation: Vol. 84, No. 21 Citation Date: 01/31/2019

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

No payments or gifts have been or will be provided 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, 19 USC Sec 1905, which requires EXIM to protect confidential business and commercial information from disclosure, as well as, 12 CRF 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.

Not applicable. No information of sensitive nature is requested.

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

The number of respondents:	150
Estimated time per respondents:	90 minutes
The frequency of response:	Annually
Annual hour burden:	225 total hours

The estimated burden was calculated using an average of 90 minutes for each survey submission (per lender/exporter per year on average). This includes the time to review instructions, search existing data resources, gather the data needed, and complete the information collection.

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 13).

There is no other additional cost burden other than that already reflected in items 12 and 13.

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

Reviewing time per response:	45 minutes
Responses per year:	150
Reviewing time per year:	112.5 hours
Average Wages per hour:	\$42.50
Average cost per year:	\$4,781.25
Benefits and overhead:	20%
Total Government Cost:	\$5,737.50

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

Item 13 is corrected in this submission to answer the prompt correctly and no longer reports the estimated cost burden to respondents that was previously supplied in error. There are no changes to item 14 as compared to the previous submission.

In addition EXIM shortened and simplified a number of the survey questions to reduce the chances of misinterpretation. We also added questions on our Short-Term and Working Capital programs. Previously the scope of the survey was exclusively related to our Medium Long Term (MLT) programs.

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.

No complex analytical techniques will be used in the tabulation of the data. Survey results will be aggregated and the responses would not be attributable to individual survey participants. Relevant highlights from the survey will be published internally and externally. Response rate data will be included in the publication and all the dependencies in generating the conclusions will be stated.

The following schedule outlines the project management plan. The plan is subject to change based on variables that may be beyond EXIM's control.

OMB clearance processes: November 30, 2018 – January 30, 2019  
Survey administration to predetermined sample: February 1, 2019 – February 28, 2019  
Survey analysis and tabulation: March 1, 2019 – March 15, 2019  
Publication of survey highlights in Competitiveness Report on EXIM.gov: June 30, 2019

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 this approval.

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

No exceptions.

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