

Supporting Statement for Paperwork Reduction Act Submissions

EIB 92-36 Application for Issuing Bank Credit Limit (IBCL) Under Lender or Exporter-Held 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.

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.

EXIM has made no changes to the report as compared to the previous version and is asking for a renewal of approval.

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.

This form is used by a financial institution (or broker acting on its behalf) in order to obtain approval for coverage of a specific issuing bank. The information received provides EXIM staff with the information necessary to make a determination of the eligibility of the issuing bank and transaction for EXIM assistance under its insurance program.

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 application online and in hard copy form (e.g., via mail or fax). The online application offers the U.S. exporting community the opportunity to electronically submit and manage an insurance policy, which will reduce the paperwork burden, reduce processing times, and minimize the expense of using mail service.

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.

All applications are independent of each other; therefore this is no duplication since each application corresponds to a unique insurance product. Should some information already be on file, the application allows 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.

Pursuant to the response in #3 above, the burden to small businesses is reduced largely through unnecessary, back-and-forth transmission of paper or hard copy documents whose timeliness through the mail system is inconsistent, untimely, and could be lost in transit.

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 application form, EXIM would be unable to make the necessary judgments to determine eligibility of the applicant. Without those judgments, EXIM would not be able to provide the coverage needed by our customers.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- a. requiring respondents to report information to the agency more often than quarterly;
- b. requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- c. requiring respondents to submit more than an original and two copies of any document;
- d. 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;
- e. requiring the use of statistical data classification that has not been reviewed and approved by OMB;
- f. 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
- g. 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 CRF 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. 83, #243 dated 12-19-2018
No comments were received.

Day Federal Register Notice FR Vol. 84, #42 dated 03-04-2019
No comments were received.

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

EXIM does not provide any payments or gifts 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 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 private. 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.

There are no questions of a sensitive nature included on this application.

12. Provide estimates of the hour burden of the collection of information, including:

The number of respondents	600
The frequency of response	As needed
The annual hour burden	720
An explanation of how the burden was estimated.	From time to time staff completes a "sample" application form for use in system testing, training, etc. The time it takes for staff to fill out the application form is 30 minutes. If the applicant has their credit information at hand, it should take the respondent 30 minutes as well. For burden calculation purposes, we assumed that it would take on average 1.2 hour for respondents to complete the application. We receive, on average over the last three years, 600 applications. Thus, the annual

	burden rate can be calculated as $600 * 1.2 = 720$ hours.
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- 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).

There is no monetary burden to respondents other than the hour burden estimated in (12).

- Provide estimates of annualized costs to the Federal government.

Reviewing time per year:

Responses per year	600
Reviewing time (hours) per year	600
Average wages per hour	\$42.50
Average cost per year (time * wages)	\$25,500.00
Benefits and overhead	20.00%
Total Government Cost	\$30,600.00

- Explain the reasons for any program changes or adjustments reflected in the public burden or government costs.

The expected number of respondents has been updated.

Additionally, several changes were made to the form itself that don't impact the public burden or government cost. The changes are described below.

This form has been updated to include a new Certification and Notices section as well as a new statement explaining EXIM Bank's limitation on support for goods subject to trade measures or sanctions.

The Export-Import Bank has made a change to the report to have the insured financial institution provide the industry code (NAICS) associated with each specific export as well as specific information needed to make a determination as to whether or not the exporter meets the SBA's definition of a small business. The insured financial institution already provides a short description of the goods and/or services being exported and the name and address of the exporter. These additional pieces of information will allow Ex-Im Bank to better track what exports it is covering with its insurance policy and the extent to which its support assists U.S. small businesses.

The other change that EXIM Bank has made is to require the insured financial institution to indicate whether the exporter is a minority-owned business, women-owned business and/or veteran-owned business. Although answers to the question are mandatory, the company may choose any one of the three answers: Yes/No/Decline to Answer. The option of "Decline to Answer" allows a company to consciously decline to answer the specific question should they not wish to answer.

- 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 publication or tabulation of collected information is intended. No complex analytical techniques will be applied.

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.

Part B. – Collection of Information Employing Statistical Methods

1. 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.

Statistical methods are not used in this information collection.