

Supporting Statement for Paperwork Reduction Act Submission
OMB 3048-0019
EIB 92-41 Application for Financial Institution Short-Term, Single-Buyer Insurance

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, pursuant to the Export Import Bank Act of 1945, as amended (12 USC 635, et.seq.), facilitates the finance of the export of U.S. goods and services. The “Application for Financial Institution Short-term Single-Buyer Insurance” form will be used by financial institution applicants to provide EXIM with the information necessary to obtain legislatively required assurance of repayment and fulfills other statutory requirements.

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 will be completed by entities involved in the export of U.S. goods and services.

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.

The majority of these forms are received electronically, together with electronic attachments of supporting credit information. EXIM processing is fully electronic and concludes with the issuance of a document sent electronically to the applicant. Technology accelerates the entire process but does not necessarily reduce the

amount or substance in credit information required from the applicant. Accessibility to policy documents is considerably improved for participants through technology.

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. In circumstances where 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.

Pursuant to the response in #3 above, the burden to small businesses is reduced largely through the elimination of the 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 collected by this form, EXIM would be unable to make the determination if the subject transaction is eligible for EXIM insurance coverage and, thus, unable 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”
 - *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 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. 84, #67 on 04/08/2019.

Comments were received as a single submission from a group of nongovernmental environmental advocate organizations. The comments discussed the potential of environmental consequences of EXIM supported projects if proper due diligence is not undertaken by EXIM.

EXIM responded to the comments by explaining to the commenters that EXIM Bank's Applications and Forms are developed in line with EXIM's Environmental and Social Due Diligence Procedures and Guidelines. EXIM looks for ways to improve its processes to ensure that the different types of risk associated with applications for support, within a given financial program, are assessed appropriately. EXIM carefully considers all public recommendations as it revisits Applications and Forms and the underlying policies reflected in these instruments.

30 Day Federal Register Notice FR Vol. 84, #116 on 06/17/2019.

9. Explain any decision to provide any payment or gift 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 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.

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

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

- *the number of respondents: 215
- *the frequency of response: Annual
- *annual hour burden: 344 hours
- *an explanation of how the burden was estimated.

The estimated burden was calculated using an average of 1.6 hours for each submission, including the completion of an electronic form and accumulating, then attaching electronic credit and other supporting information.

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).

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

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

Responses per year:	215
Average review time:	6 hours
Reviewing time per year:	1,290
Average Wages per hour:	\$42.50
Average cost per year:	\$54,825 (time * wages)
Benefits and overhead:	20%
Total Government Cost:	\$65,790

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

There are no program changes or adjustments that affect the public burden or government costs.

The information collecting form has been modernized and additional explanations have been added to some of the questions.

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 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

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.