

Supporting Statement for Paperwork Reduction Act Submissions
Export-Import Bank
Form EIB 84-01

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.

Response:

This is an application form for working capital loan guarantees provided by EXIM Bank. EXIM Bank is the U.S. Government agency (created by the Export-Import Bank of 1945 as amended) that facilitates the export financing of U.S. goods and services. This collection of information is necessary under Sec. 635(a) (1) to determine eligibility of applicant for EXIM Bank assistance or participation.

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.

Response:

The application provides EXIM Bank staff with the information necessary to determine if the application and transaction are eligible for EXIM Bank assistance.

References to SBA have been removed as this application is no longer a joint form with SBA. The joint form no longer serves the purpose it originally intended to years ago, as a combined effort for both working capital programs. In addition, EXIM is moving toward an electronic format by which EXIM applicants will apply to it program online through our portal. If EXIM kept the joint application, the SBA would not benefit from this electronic platform.

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.

Response:

EXIM Bank is currently working on developing a system that will include the on-

line submission of applications. This system is expected to be deployed during FY20.

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.

Response:

All applications are independent of each other, i.e. no duplication. In circumstances when some information may already be on file at EXIM Bank, the application includes language allowing the application to indicate so.

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

Response:

As noted in question number 11, on average the Export-Import Bank receives approximately 200 applications per year (from both medium and small businesses). To minimize the burden on these small entities, the form is accessible on-line and the agency has limited the information collected to that which is necessary for EXIM Bank to make informed decisions about the loan application. In addition, the application will be available on a system that would allow online submissions of application packages that will further reduce burden in FY20.

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.

Response:

The consequence to the Federal program would be that EXIM Bank would not be able to determine if an application and transaction to be guaranteed is eligible, thereby making it impossible to operate the program.

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.

Response:

Collection of information is consistent with the guidelines in 5 CRF 1320.6.

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.

Response:

A request for public comments was published in the Federal Register, Vol. 84 No. 240 pg 68169 on December 13, 2019. The comment period ended February 11, 2020. Two comments were received; however, they were irrelevant to the document published.

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

Response:

Delegated Authority Lenders, as approved by EXIM Bank, are entitled to retain a certain portion of the facility fee paid by the Exporter. Delegated Authority Lenders serve as one of the means by which the program is made available to the public. EXIM Bank does not provide payments or gifts to respondents as incentive to respond to this information collection.

9. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Response:

EXIM Bank, and their officers and employees are subject to the Trade Secret Act, 18 U.S.C. Sec. 1905, which requires them to protect confidential information from disclosure, to the extent permitted by law. In addition, EXIM Bank's regulations at 12 CRF 404.1 provides that, except as required by law EXIM Bank will not disclose information provided in confidence without the submitter's consent.

10. 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.

Response:

EXIM's answer: No sensitive questions are involved as that term is described by OMB. This information collection does contain questions concerning an applicant's criminal background in order to make sound determinations concerning an application's character.

11. Provide estimates of the hour burden of the collection of information. The statement should include: the number of respondents; frequency of response; annual hour burden; an explanation of how the burden was estimated; and the hour cost burden.

Response:

Based on the average number of loans received since this information collection was last submitted for review, the estimated annual burden information for this collection is as follows:

	<u>EXIM Bank</u>
Annual Number of Respondents:	200
Estimated Time per Respondent:	2 hours
Annual Burden Hours:	400 hours
Frequency of Reporting of Use:	Annually

Estimated Time per Respondent is 2 hours, which takes into account the soon-to-be online submission, access, and review of the application.

12. 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 11 and 13).

Response:

There are no additional costs, such as capital or startup costs associated with this information collection.

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

Response:

	<u>EXIM Bank</u>
Reviewing time in hours	2
Responses per year	200
Review time per year	300
Average wages per hour	\$42.5

Average cost per year	\$12,750
Benefits and Overhead	20%
Total Government Cost	\$15,300

14. Explain reasons for and program changes or adjustments reported in Items 11 or 13 of the OMB Form 83-I.

Response:

The average number of responses has declined over the past three years as the private sector has become more comfortable with the credit risk of borrowers and the volume of revenue generated by those customers. In addition, capital has been abundant and less expensive in the market over the past few years; therefore allowing increased investment and availability of cash from private entities to those customers. Consequently, the burden information reported has been adjusted to reflect the decrease in responses.

15. 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.

Response:

Not applicable. Information collected is not published. Any publishing of information collected is not related to the original purpose of the application.

16. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Response:

Not applicable. We are not seeking approval not to display the expiration date.

17. Explain each exception to the certification statement in item 16.

Response:

There are no exceptions.

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.

Response:

Statistical methods are not used in this information collection.

