## SUPPORTING STATEMENT FOR APPROVAL

## A. Justification

- 1. Legal authority for this information collection is found in the Defense Production Act (the "Act"), 50 U.S.C. 4501 *et seq and the delegation of authority in EO 13922*. DFC-014 Application for DFC-DPA Loan Program is the principal document to be used by the U.S. International Development Finance Corporation ("DFC") to determine if the proposed transaction is eligible for DFC-DPA financing and whether it meets required underwriting criteria.
- 2. The Application for DFC-DPA Loan Program will be the principal document used by the agency to determine the project's eligibility for financing and will collect information for financial underwriting analysis.
- 3. This form is completed with the use of either a fillable PDF or a web-based application. This provides a secure and efficient means for applicants to transmit the required information to the agency.
- 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 the DFC-DPA Loan Program.
- 5. DFC-DPA Loan Program applicants are expected to include large and small businesses. The same questions are asked of all applicants. The complexity of the answers will depend upon the nature of the project for which a DFC-DPA loan is being requested.
- 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 from program users. This would reduce the amount of time that could be devoted to working with applicants/clients and credit analysis and underwriting, thereby reducing the productivity and administrative efficiency of the DFC-DPA Loan program.
- 7. No special circumstances exist that would cause the information collection to be conducted in a manner contrary to Items A-H.
- 8. Special circumstances exist that require an emergency clearance, therefore no notice has been published in the *Federal Register*, although one will be submitted concurrent with this submission to OMB OIRA, and a copy is included. Although no public comment has been solicited on this collection, the information collected is substantially like the information collected in DFC's currently approved information

collections OMB 3015-0004 and OMB 3015-0006, which both underwent a full public comment process. In addition, DFC intends to issue a request for public comments as part of a request for regular clearance shortly after launching the DFC-DPA Loan Program.

- 9. No payments and gifts are offered to respondents.
- 10. When trade secrets or confidential commercial or financial information are submitted to the agency in this collection, they will be held in confidence to the extent permitted by applicable law including the Freedom of Information Act ("FOIA") at 5 U.S.C. section 552(b)(4) and the agency's implementing regulations at 22 C.F.R. Part 706.
- 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:
  - 100 respondents
  - x 1 per respondent
  - =100 total annual responses
  - x (1.5 hours per average respondent)
  - =150 respondent hours
  - x \$75/hour for personnel, record-keeping, overhead
  - \$11,250 total cost to respondents

Respondents only complete the form once per request for financing.

- 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 DFC's secure servers, there will be no postage or storage costs.
- 14. The estimated annualized cost to the Federal government is as follows:

100	respondents per year
x 1	per respondent
100	total annual responses
x 1	average hours to review one response
100	total federal hours
x \$58.13	GS-14/1 (DCB) hourly wage
\$5,813.00	total cost to the Federal government

- 15. This is a new information collection.
- 16. Not applicable. Information provided in the application is not published.
- 17. To avoid confusion between the six-month expiration of this clearance and the two year

expiration of this program, DFC is requesting that OMB expiration date be removed from the information collection. DFC intends to include the expiration date once a regular clearance is processed, which should set the expiration date of the clearance to be commensurate with the end of the program.

18. Not applicable. No exceptions are being requested on the certification statement.