## JUSTIFICATION FOR NON-SUBSTANTIVE CHANGE REQUEST

REQUEST FOR ADVISORY OPINION 1405-0174 | DS-7786

This non-substantive change request seeks to provide OMB with updated instructions for the Advisory Opinion form DS-7786.

On October 19, 2020 OMB approved a revision/renew change request for IC 1405-0174 (DS-7786) to allow for electronic submission of an Advisory Opinion with defined data fields which are most relevant and necessary for requests for Advisory Opinions. Since then, the instructions have been updated to provide more clarity to industry submitters. The revised instructions and subsequent DECCS application enhancements will allow for a more clear and concise response and reduce the number of DS-7786 Returned Without Action (RWA).

DDTC is not making changes to the information being collected or the means through which it is submitted. Although the instructions will provide more clarity and the DECCS system enhancements will allow more space for responses to be submitted, industry will continue to access and submit the DS-7786 electronically through DDTC's website.