

## Supporting Statement for Paperwork Reduction Act Submission

### EIB 92-79 Broker Registration Form

#### 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 the export of U.S. goods and services. In order to fulfil its mission, EXIM partners with various institutions, including private insurance brokers who assist EXIM in providing guidance and counseling to U.S. companies utilizing EXIM's products. Subject to compliance with certain terms and conditions, an insurance broker may apply to become registered with EXIM. This collection of information is necessary, pursuant to 12 USC 635 (a)(1), to determine eligibility of the applicant to become a registered EXIM broker.

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.

The application is used by insurance brokers to register with EXIM. The application provides EXIM staff with the information necessary to make a determination of the eligibility of the broker to receive commission payments under EXIM's credit insurance programs.

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 in hard copy form (e.g via mail or fax). The form is fillable and EXIM expects it to be available electronically in the near future as it is planning to add it to the online system. This will allow EXIM customers the opportunity to electronically submit the form, which will reduce the paperwork burden and reduce processing times as well as minimize the expense of using mailing services.

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, i.e., no duplication. The application allows the applicant to indicate when information is already on file with EXIM.

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

Based on discussions with broker applicants, we have not received any complaints from small businesses with the application process. Applicants understand the due diligence that is needed, such as requesting copies of the applicant's insurance license to ensure that they are certified insurance brokers. Once approved, the brokers will be promoting and selling EXIM products. The private sector has a similar application process.

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 forms, EXIM would be unable to make the necessary judgments to determine eligibility of a broker to receive commission payments under EXIM's credit insurance programs. Without the needed evaluations, EXIM will be unable to provide U.S. companies with the guidance and counseling that brokers provide, thus negatively impacting the number of companies we can support.

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 CFR 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 Vol. 82, #198 dated 10-16-2017

2 comments were received. However, neither pertained to the form and no action was required.

30 Day Federal Register Notice Vol. 83, #13 dated 1-19-2018

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

Not applicable. EXIM does not provide a payment or gift 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, 18 U.S.C. Sec. 1905, which requires EXIM to protect confidential business and commercial information from disclosure, and to 12 CFR 404.1, which provides that, except as required by law, EXIM will not disclose information provided in confidence without the submitters 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

Not Applicable. No sensitive questions are involved.

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

Number of Respondents Classified as Small Business Entities 40 (80%) – Over a three year period.

Annual number of respondents: 17  
Frequency of response: once every three years  
Annual public burden: 4.25 hours

An explanation of how the burden was estimated:

From time to time EXIM staff sits down and fills out the form with a sample data. Recently, it took the staff 15 minutes to complete the form. Over a three year period EXIM receives 50 broker applications, which averages to 17 per year.

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).

Not applicable.

14. Estimated Annualized Cost to the Federal Government:

Reviewing time/Hours: 2  
Responses per Year: 17  
Review Time per Year: 34 hours  
Average Wages per Hour: \$42.5  
Wages per Year: \$1,445  
Benefits & Overhead: 20%  
Total Government Cost: \$1,734

15. Explain the reasons for any program changes or adjusted reported in items 13 or 14 of OMB from 83-1.

The expected number of respondents has been updated to reflect the last 4 years.

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.

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

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.

Not applicable.

18. Explain each exception to the certification statement identified in Item 19  
“Certification for Paperwork Reduction Act Submissions,” of OMB Form 83.

Not applicable.

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:

1. Describe (including numerical estimate) the potential respondent universe and any sampling or other respondent selection methods to be used.

The application does not use statistical survey methodology