

Supporting Statement for Paperwork Reduction Act Submissions
[OMB Control #3048-0053]

EIB 18-01 Multi-Buyer Policy: Reasonable Spread of Risk (RSOR) Exclusions Worksheet

Additional Information related to the to the Export Import Bank's privacy policies for **EIB 18-01** collection:

- 1) Is the information collected maintained as part of a system of records?

Information collected by this form is maintained in a system that is not a System of Records. The collected information pertains to corporations and institutions, not to private individuals. In those cases when a sole proprietorship is the customer, the information provided represents a business. The contact information is for an individual in a professional capacity, representing an institution or a corporation, and not Personally Identifiable Information.

- 2) Does EXIM have a Privacy Impact Assessment (PIA) or System of Records Notice that is applicable to the information collected?

The most recent PIA applicable to the collected information is the EXIM Online (EOL) PIA, dated June 25, 2018. The PIA determined that EOL is not a System of records under the Privacy Act, 5 U.S.C 552a.

- 3) Has the form contained in this information collection request been reviewed by EXIM's privacy office or staff?

Yes, this form has been reviewed by EXIM's privacy office.

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.

Pursuant to the Export-Import Bank Act of 1945, as amended (12 USC 635, et seq.), the Export-Import Bank of the United States (EXIM), facilitates the finance of the export of U.S. goods and services by providing insurance or guarantees to U.S. exporters or lenders financing U.S. exports. The Multi-Buyer Policy: Reasonable Spread of Risk (RSOR) Exclusions Worksheet will be used by external customers, current policyholders and portfolio managers to determine eligibility of EXIM Bank support under the RSOR Policy.

2. Indicate how, by whom and for what purpose the information is to be used.

In March 2017, the eligibility requirements for the Small Business Express Policy changed to include a “graduation” requirement for policyholders who had been in the program three or more years. One of the three alternative policies for graduates is the RSOR. As a result, there has been revitalized interest in this policy which requires the gathering of information located on the Multi-Buyer RSOR Exclusions Worksheet. The proposed form was previously available to customers, so this is not a creation of a new form, but renewal of a prior form that was previously used by internal and external participants. The information collected on this form will allow streamlined processing and evaluation of policy applicants for program compliance.

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 electronically. The online application offers the U.S. exporting community the opportunity to electronically submit a claim, which reduces the paperwork burden and processing times, and minimizes 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.

Each form is independent of the other, i.e., no duplication, since each form corresponds to a unique product. In circumstances when 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.

The electronic submission of the forms reduces the paperwork burden on small businesses and processing time for EXIM. Paper forms have been used in the past. We are encouraging our customers to submit their claims online.

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.

Making this form available to customers is meant to streamline the collection of the information needed to effectively evaluate and provide an approval decision within a justified and supported policy parameter framework under the RSOR structure. To currently underwrite a RSOR request, the information is collected in various formats and can be erroneously omitted from the initial application resulting in unnecessary delays. The worksheet will help guide customers to provide the required information to complete the application package via an easy and organized method.

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 FR Vol. 86, #63377 dated 11/16/2021

No comments.

30 Day Federal Register Notice FR Vol. 87, #4593 dated 01/28/2022

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 any 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, as well as 12 CFR 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 private. 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 in the questionnaire.

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

Annual Number of Respondents:	60
Estimated Time per Respondent:	15 minutes
Annual Burden Hours:	15 hours
Frequency of Reporting or Use:	As needed

An explanation of how the burden was estimated:

From time to time EXIM staff sits down and fill out the form with a sample transaction. Recently, it took staff about 15 minutes to fill out the form. Presuming that all transaction information is collected together in a transaction file, the claimant should also be able to complete the form in 15 minutes.

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. Provide estimates of annualized costs to the Federal government

Reviewing time per Response:	1 hour
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Responses per year:	60
Reviewing time per year:	60 hours
Average Wages per hour:	\$42.50
Average cost per year: (time * wages)	\$2,550
Benefits and overhead:	20%
Total Government Cost:	\$3,060

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

Not applicable.

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.

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.

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 collection.