

**Supporting Statement for Paperwork Reduction Act Submissions
EIB 94-07 Exporter's Certificate For Use With A Short Term Export Credit
Insurance Policy**

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.

Additional Information related to the to the Export Import Bank's privacy policies for **EIB 94-07** 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.

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 export of U.S. goods and services. By neutralizing the effect of export credit insurance and guarantees offered by foreign governments and by absorbing credit risks that the private sector will not accept, EXIM enables U.S. exporters to compete fairly in foreign markets on the basis of price and product. This collection of information is necessary, pursuant to 12 USC Sec. 635 (a) (1), to determine eligibility of the export for EXIM assistance.

This form will enable EXIM to identify the specific details of the export transaction. These details are necessary for determining the eligibility of claims for approval.

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.

EXIM staff and contractors review this information to assist in determining that an export transaction, on which a claim for non-payment has been submitted, meets all of the terms and conditions of cover.

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.

This form is provided on our website as a fillable form however, it must be manually signed. Policy holders maintain possession of these forms and only submit them to EXIM if they submit a claim on the transaction. A PDF or other electronic format of this form can be used to submit it to EXIM.

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 export transactions are independent of each other; therefore this is no duplication since each export corresponds to a unique financing transaction.

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

The ability to complete the form electronically, except for the signature, and submit electronically reduces the paperwork burden on small businesses and processing time for EXIM.

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.

Without the collection of this information, the likely result is the payment of claims that are not eligible for support, which do not conform to EXIM requirements or USG restrictions.

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. 83, #139 dated 07-19-2018

- No Comments were received

30 Day Federal Register Notice FR Vol. 83, #139 dated 10-00\3-2018

- No Comments were received

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.
No payments or gifts are provided 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, 19 USC 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.

No information of sensitive nature is requested.

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

- * number of respondents: 240
- * frequency of response: As required
- * annual hour burden: 60 hours
- * an explanation of how the burden was estimated:

The time it takes for staff to fill out the application form is about 5 minutes. For burden calculation purposes, we assumed that it would take on average 15 minutes for respondents to complete the application.

Note for the 2019 submission: The public annual hour burden of 60 hours has not changed for this ICR submission as compared with the previous submission in 2015. This public hour burden was correctly reflected in the Federal Register notices published in 2015 and 2018. However, the entry of that burden in ROCIS was not made correctly in 2015. This year's (2019) entry in ROCIS is now correct and reflects the calculations published in the Federal Register and this Supporting Statement, Item (12).

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).

There are no monetary costs to respondents outside of the hour burden estimated in (12).

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

Reviewing time per response:	3 minutes
Responses per year:	240
Reviewing time per year:	12 hours
Average Wages per hour:	\$42.50
Average cost per year:	\$510
(time * wages)	
Benefits and overhead:	20%
Total Government Cost:	\$612

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

No adjustments were made to items 13 and 14.

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.

No tabulation or publication of information is intended. No complex analytical techniques will be used.

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.

Ex-Im Bank is not seeking this approval.

18. Explain each exception to the certification statement identified in "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-1.

No exceptions are requested.

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 information collection.