## SUPPORTING STATEMENT FOR APPROVAL

## A. Justification

- 1. Legal authority for this information collection is found in the Better Utilization of Investments Leading to Development Act of 2018 (the "BUILD Act"), Public Law 115-254. DFC-006 Personal Identification Form is used by the agency in its Know Your Customer due diligence procedures. The agency performs a robust due diligence review on each party that has a significant relationship to the projects the agency supports, and this collection is one aspect of that review.
- 2. The information collected is used by DFC officers and analysts to request Know Your Customer due diligence checks on relevant parties.
- 3. This form is completed with the use of 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 DFC's programs.
- 5. The parties that have significant relationships with the projects the agency supports include individuals and business entities of various types and sizes. The information that each filer provides depends upon whether they are an individual or a business entity, and for the business entities, it depends upon the complexity of their organization. Individuals and smaller business entities (because of their generally lower organizational complexity) provide the least information and thus have a lower burden.
- 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 agency applicants/clients. This would reduce the amount of time that could be devoted to working with applicants/clients on the origination of transactions, thereby reducing the productivity and administrative efficiency of the agency.
- 7. No special circumstances exist that require the information collection to be conducted in a manner inconsistent with the guidelines of the Paperwork Reduction Act and OMB's implementing regulations.
- 8. The first Federal Register Notice was published on May 18, 2022 (87 FR 30209). The agency did not receive any public comments. The second Federal Register Notice

was published on July 22, 2022 (87 FR 43799).

- 9. No payments and gifts are offered to respondents.
- 10. Applicant information provided in the DFC-006 is deemed designated as "confidential commercial information" in accordance with Freedom of Information Act (FOIA) regulations at 22 C.F.R. Part 706 and will be treated as such to the extent permitted by applicable law. Personal information belonging to an individual will not be released under the FOIA unless the information is already public or if the public interest is greater than the private interest under 5 U.S.C. § 552(b)(6).
- 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:

975 respondents

x 1 per respondent

=975 total annual responses

x (1 hour per average respondent)

=975 respondent hours

x \$75/hour for personnel, record-keeping, overhead

\$73,125 total cost to respondents

- 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:

975	respondents per year
x 1	per respondent
975	total annual responses
x 1	average hours to review one response
975	total federal hours
x \$60.49	GS-14/1 (DCB) hourly wage
\$58,977.75	total cost to the Federal government

15. The total number of respondents has increased.

- 16. Not applicable. Information provided in the application is not published.
- 17. Not applicable. The OMB expiration date will be printed on each form.
- 18. Not applicable. No exceptions are being requested on the certification statement.