

EXPORT-IMPORT BANK OF THE UNITED STATES

Agency Information Collection Activities Submission for OMB Review

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 00-02** collection:

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

Information collected by this survey is not maintained in a system of records.

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

The most recent PIAs applicable to the collected information are the EXIM Online (EOL) PIA, dated August 2023, and Application Process System (APS) PIA, dated May 2023. The PIAs determined that EOL and APS are not Systems 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.

PART 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 purpose of the survey is to fulfill the statutory mandate (Export-Import Bank Act of 1945, as amended, 12 U.S.C. 635) to submit an Annual Competitiveness Report to the appropriate congressional committees. The Act specifies certain required information, including results of a survey of U.S. exporters and commercial lending institutions that provide export credit to determine their experience in meeting financial competition from foreign countries whose exporters compete with U.S. exporters.¹

¹ 21-01-19-exim-bank-2019-charter-as-amended-final.pdf
Ex-Im Bank Charter: Section 8

- 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 survey results are used by EXIM in its congressionally mandated annual report on the agency's competitiveness relative to other countries' export credit agencies (ECAs). The purpose of the survey and the annual report on competitiveness is to inform an assessment on the financial terms and conditions available to U.S. exporters and how they compare to the financial terms and conditions offered by foreign official export credit providers that compete with US exporters. The aggregated information collected in the survey is included in the report and can inform EXIM deliberations on possible new programs and policy adjustments that would maintain the level playing field and enable buyers to make purchase decisions based on the quality and suitability of the product without regard for financing terms. The survey also affords U.S. exporters and financial institutions an opportunity to provide the U.S. Congress and other interested parties with insights regarding their experience working with EXIM and other foreign ECAs. This information can inform Congressional action related to EXIM's periodic charter renewal. Survey results are also of keen interest to the global ECA community and can guide positions ECAs, including EXIM, take in international negotiations.

To boost the response rate and give respondents an opportunity to more fully convey their views, EXIM is revamping its survey, reducing the number of questions while expanding the opportunities for open responses. On the face of it, the new survey reduces the number of response items from 94 to 21, with items being selectively removed or consolidated. For instance, 6 questions related to background information about respondents were dropped to focus more on their views and experience rather than corporate profile. Additionally, the new survey simplifies the questionnaire by introducing a grid format that consolidates 14 competitiveness-related policies and practices and asks respondents to choose the degree and direction of influence (choosing from among 6 options from negative to positive or unknown). Respondents are also asked to explain in an open response question any or all choices as needed. With this revised format, EXIM no longer has to ask multiple questions to try to drill down to identify respondents' experience with individual policies or programs. EXIM

Sec. 8A. Annual Competitiveness Report.

(a) In General.- Not later than June 30 of each year, the Bank shall submit to the appropriate congressional committees a report that includes the following:

(1) Actions of Bank in providing financing on a competitive basis, and to minimize competition in government supported export financing.- A description of the actions of the Bank in complying with the second and third sentences of section 2(b)(1)(A). In this part of the report, the Bank shall include a survey of all other major export-financing facilities available from other governments and government-related agencies through which foreign exporters compete with United States exporters (including through use of market windows (as defined pursuant to section 10(h)(7))) and, to the extent such information is available to the Bank, indicate in specific terms the ways in which the Bank's rates, terms, and other conditions compare with those offered from such other governments directly or indirectly. With respect to the preceding sentence, the Bank shall use all available information to estimate the annual amount of export financing available from each such government and government-related agency. In this part of the report, the Bank shall include a survey of a representative number of United States exporters and United States commercial lending institutions which provide export credit on the experience of the exporters and institutions in meeting financial competition from other countries whose exporters compete with United States exporters.

expects to obtain more fulsome information and be in a position to give a stronger voice to respondents' views.

- 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.

Respondents will complete the survey online via commercial survey software. EXIM anticipates that all respondents' workplace computers use Microsoft Office, which includes the MS Forms product used for this survey since 2020. During the three years that EXIM has used MS Forms, there has not been any negative feedback about the product or respondents' ability to access the survey.

- 4) Describe efforts 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.

This is not an anonymous survey. To avoid duplication, it requires participants to provide their name, the name of their company, and other key identifying information.

As a USG agency, EXIM operates on a fiscal year basis, but Congress specifies that the survey cover the most recently concluded calendar year. For this reason, EXIM cannot substitute fiscal year or historic data. To comply with Congress's mandate, it is necessary for EXIM to survey participants who were actively involved in providing export credit during the designated time period. Data covering other time periods cannot be substituted, if EXIM is to comply with its congressional mandate.

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

Most small businesses use EXIM's short term programs, while the survey solicits customers' experience with EXIM's medium- and long-term programs. The survey's focus is only on medium- and long-term credit, because EXIM's foreign ECA competitors are not uniformly active in the short-term trade credit marketplace. Nevertheless, if a small business has applied for or received support for medium- and long-term sales during the time period under review, they will be invited to participate in the survey. Respondents may skip questions and only provide responses on issues pertinent to their experience, which serves to minimize the burden on all participants.

- 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.

EXIM has a strict mandate from Congress to conduct this survey and to include results in an Annual Competitiveness Report that must be submitted by June 30th of each year. This mandate is embedded in EXIM's Charter. Failure to meet this mandate would put EXIM out of compliance with its Charter.

- 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;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- 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 CRF 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.

The 60-Day Federal Register citation was posted in Federal Register Volume 88, Number 153 August 10, 2023. The review period closed without comment.

The 30-Day Federal Register was posted in Federal Register Volume 88, Number 200 (October 18, 2023).

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

Participants will not be provided any payments or gifts.

- 10) Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Ex-Im Bank and its officers and employees are subject to the Trade Secrets Act, 18 USC Sec 1905, which requires Ex-Im Bank to protect confidential business and commercial information from disclosure, as well as, 12 CFR 404.1, which provides that, except as required by law, Ex-Im Bank 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 considers 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.

The survey does not include any questions of a sensitive nature.

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

- the number of respondents;
- the frequency of response;
- annual hour burden; and
- an explanation of how the burden was estimated.

Annual Number of Respondents:	112
Estimated Time per Respondent:	15 minutes
Annual Burden Hours:	28
Frequency of Reporting or Use:	Yearly

The number of respondents is based on 1) a core group of 70 survey participants who responded in one or both the last two years, 2) exporters and banks that received authorizations in 2023 that are not among the 70 prior respondents, and 3) additional exporters and banks that have approved Letters of Interest (LIs) and/or have approached EXIM for support but whose transactions have not reached the authorization stage. Based on the current year's activity, we expect about 110 additional parties knowledgeable about EXIM's medium- and long-term programs beyond the initial 70 past survey participants, bringing the total universe of potential respondents to 180. We expect an approximately 67% response rate, meaning about 112 survey responses.

The estimated time per respondent was based on 30 seconds to respond to one-option questions, such as the respondent providing their name and company and yes/no questions. One minute was estimated to respond to open-ended questions. The total time to respond would then be 13.5 minutes, which was rounded up to 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).

There is no cost burden expected to be incurred by participants.

14) Provide estimates of annualized costs to the Federal government. Also provide a description of the method used to estimate costs, which should include quantification of hours, operational expenses, and any other expense that would not have been incurred without this collection of information.

Reviewing time per hour:	30 minutes
Responses per year:	112
Reviewing time per year:	56 hours
Average wages per hour:	\$63.43

Average cost per year (time * wages): \$3,552.08
Benefits & Overhead: 20%
Total Cost to Government: \$4,262.50

The staff time estimate accounts for a number of different tasks that span a range of skill levels. Tasks include downloading and arranging the data prior to review and analysis, as well as writing up results and conclusions. The shortened survey means less time will be spent on categorizing and counting responses to multiple choice questions, but participants are given more opportunity to provide bespoke explanations of their choice selections. Some of the time saved in measuring responses will be used to fully digest the free form comments, but an overall 15-minute reduction in average reviewing time is expected.

The average wage per hour is estimated at \$63.43, which is the hourly pay rate for a GS-14, Step 1 in the DC region. Most of the responsibility for review and analysis of the data requires the specialized knowledge and skills of a GS-14 senior practitioner. There are also aspects that involve staff above and below that level, but on balance, the GS-14 level represents an average wage across the various wage levels.

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

EXIM has prioritized streamlining the survey this year to ensure that the needed information is collected as efficiently as possible. Therefore, the time burden on respondents has been significantly reduced. The more focused survey also resulted in a shorter reviewing time for government workers to analyze the survey results.

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.

The results will be summarized and published in aggregate in the Export-Import Bank Annual Competitiveness Report to Congress, which must be submitted to Congress by June 30th of each year. The survey will be finalized for distribution to participants in early January of each year. Staff intend to conduct vigorous follow-up, by email, if a survey recipient has not responded. If necessary, a second follow-up will be made, by email or phone.

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 83-1.

Not applicable