

**Supporting Statement
for Paperwork Reduction Act Submission 3048-0033
Form EIB 10-03
Export-Import Bank Notice of Claim and Proof of Loss Short-Term Insurance**

Additional Information related to the to the Export Import Bank's privacy policies for 3048-0037 (EIB 11-04) collection:

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

Information collected by 3048-0033 (EIB 10-03) 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, not PII.

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

The most recent Privacy Impact Assessment applicable to the collected information is the EXIM Online (EOL) Privacy Impact Assessment (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 Bank's privacy office or staff?

Yes, 3048-0033 (EIB 10-03) collection has been reviewed by EXIM Bank'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. By neutralizing the effect of export credit insurance or 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. In the event that a borrower defaults on a transaction insured or guaranteed by EXIM, the insured or guaranteed exporter or lender may seek payment from EXIM by the submission of a claim. This collection of information is necessary, pursuant to 12 USC 635 (a)(1), to determine if such claim complies with the terms and conditions of the relevant insurance policy or guarantee, as the case may be.

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 insures receivables for exporters selling to creditworthy buyers of U.S. goods and services in order to help U.S. exporters compete against suppliers in other countries offering officially supported export credits and fill gaps in the availability of private export financing. The insurance policies cover the repayment risks on the foreign buyer's debt obligations. EXIM guarantees that, in the event of a payment default by the borrower, it will repay the exporter the outstanding amount, with interest.

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.

Absent the information required in the online forms, EXIM would be unable to document proof of loss, process claims, and pay insured.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:
 - a. requiring respondents to report information to the agency more often than quarterly;
 - b. requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
 - c. requiring respondents to submit more than an original and two copies of any document;
 - d. 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;
 - e. requiring the use of statistical data classification that has not been reviewed and approved by OMB;
 - f. 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
 - g. 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. 89, #45886 dated 05-24-2024

No comments were received.

30 Day Federal Register Notice Vol. 89, # 66720 dated 08-16-2024

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 payments or gifts 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.

Not applicable – no questions of sensitive nature are asked by this instrument.

12. Provide estimates of the hour burden of the collection of information, including:

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|---|--|
| The number of respondents | 75 |
| The frequency of response | As needed |
| The annual hour burden | 75 hours |
| An explanation of how the burden was estimated. | From time-to-time EXIM staff completes a “sample” application form for use in system testing, training, etc. The time it takes for the staff to fill out the application form is about 60 minutes. For burden calculation purposes, we assumed that it would take on average 60 minutes for respondents to complete the application. |

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 – Aside from the time expenditure estimated in item 12, there is no monetary cost burden or any other burden on the respondent.

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

Government Expenses:

Reviewing time per year:

| | |
|---|----------|
| Responses per year | 75 |
| Reviewing time (hours) per year | 75 hours |
| Average wages per hour | \$42.50 |
| Average cost per year (time * wages) | \$3,188 |
| Benefits and overhead | 20% |

| | |
|-----------------------|---------|
| Total Government Cost | \$3,825 |
|-----------------------|---------|

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

There were minor changes made to the information collection instrument as compared to the previous period of authorization, including formatting, removed parts that pertained to the medium-term insurance claim and removed the certification component, and added questions for the new variation of the ESS short-term policy. The estimated number of annual respondents have been decreased in accordance with the observed number of respondents in the past three years of use. The time to prepare has increased due to the information that needs to be submitted with this instrument.

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. No tabulation or publication of results is performed for the information collected by this instrument. No complex analytical techniques are applied to process the collected information.

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. EXIM is not seeking approval to not display the expiration date for OMB approval of the information collection.

Part B. – Collection of Information Employing Statistical Methods

1. 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.

Not applicable. No information requiring the use of statistical methods is being collected by this instrument.