

Supporting Statement for Paperwork Reduction Act Submissions

EIB 92-36 Application for Issuing Bank Credit Limit (IBCL) Under Lender or Exporter-Held Policies

Additional Information related to the to the Export Import Bank's privacy policies for 3048-0016 (EIB 92-36) collection:

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

Information collected by 3048-0016 (EIB 92-36) 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 July 17, 2024. 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, 3048-0016 (EIB 92-36) 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.

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 applicant for EXIM assistance.

EXIM has made no changes to the report as compared to the previous version and is asking for a renewal of 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.

This form is used by a financial institution (or broker acting on its behalf) in order to obtain approval for coverage of a specific issuing bank. The information received provides EXIM staff with the information necessary to make a determination of the eligibility of the issuing bank and transaction for EXIM assistance under its insurance program.

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 accepting this application online and in hard copy form (e.g., by mail or fax). The online application offers the U.S. exporting community the opportunity to electronically submit and manage an insurance policy, which will reduce the paperwork burden, reduce processing times, and minimize the expense of using a mail service.

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 applications are independent of each other; therefore, there is no duplication. Each application corresponds to a unique insurance product. Should some information already be on file, the application allows 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.

As stated in #3 above, the burden to small businesses is reduced largely through the elimination of the unnecessary back-and-forth transmission of hard copy documents with inconsistent timeliness and reliability of delivery by the mail system.

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 application form, EXIM would be unable to make the necessary judgments to determine eligibility of the applicant. Without those judgments, EXIM would not be able to provide the coverage needed by our customers.

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.
- 1) This collection is consistent with guidelines in 5 CFR 1320.6.
- 2) EXIM is requesting an exemption from collecting detailed race and ethnicity data specified in the 2024 SPD 15. EXIM finds the use of format that includes only the 7 minimum race/ethnicity categories, as shown in [Figure 3 of the SPD 15](#), sufficient for the business and reporting purposes of the agency and presenting the least burden to EXIM and its public customers.
 - EXIM convened its Chief Data Officer, Equity officer, product owners and technology staff to evaluate the OMB SPD15 directions for the expanded race and ethnicity question set and reviewed the use of the data, how it supports the program, statistical measures of the data collected, as well as customer feedback on working with EXIM.
 - EXIM's customer services are Business-to-Business, and its customers are not natural persons. The race and ethnicity data EXIM collects relates to majority owners of companies. In many cases this optional set of questions is not completed by the customers due to the complexity of the ownership relationship. While race and ethnicity information is important to assess EXIM's outreach, particularly to small business, the increased complexity and the more fine-grained analysis does not assist EXIM's outreach and will likely result in reduced responses to these questions.
 - In a year, EXIM supports approximately over 2000 deals with the application forms that include the optional race and ethnicity questions. Historically, only 18% of applicants respond to this set of questions. The increased fine-grain categorization is not likely to result in statistically significant results of value to EXIM program management and is likely to reduce the response rate.
 - While EXIM offers the option of on-line PDF and paper forms, the EXIM forms affected by SPD 15 are also represented as data entry screens in EXIM's e-commerce applications that integrate with EXIM's Datawarehouse technology and processes. To implement the more fine-grained option would require extensive coding and development to modify, test, and deploy representing significant costs to the agency with no apparent program benefit.

- EXIM feedback from its customers is that they want to see a simpler application process. A longer application runs counter to the customer feedback with no corresponding program value.

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. 89, # 76471 dated 09/18/2024
No comments were received.

Day Federal Register Notice FR Vol. 89, # 96651 dated 12/05/2024

9. Explain any decision to provide any payments or gifts to respondents, other than remuneration of contractors or grantees.

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.

No questions of sensitive nature are being asked.

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

The number of respondents	300
The frequency of response	As needed
The annual hour burden	150
An explanation of how the burden was estimated.	From time-to-time staff completes a “sample” application form for use in system testing, training, etc. The time it takes for staff to fill out the application form is 30 minutes. If the applicant has their credit information at hand, it should take the respondent 30 minutes as well. For burden calculation purposes, we assumed that it would take on average 30 minutes for respondents to complete the application. We receive, on average over the last three years, 300 applications. Thus, the annual burden rate can be

	calculated as 300* 30 minutes = 150 hours.
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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 monetary burden to respondents other than the hour burden estimated in (12).

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

Reviewing time per year:

Responses per year	300
Reviewing time (hours) per year	300
Average wages per hour	\$42.50
Average cost per year (time * wages)	\$12,750
Benefits and overhead	20.00%
Total Government Cost	\$15,300

15. Explain the reasons for any program changes or adjustments reflected in the public burden or government costs.

The expected number of respondents has been reduced based on actual received applications. Additional questions were added to the form about the letter of credit details, including the name of the letter of credit beneficiary and are the products environmentally beneficial.

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

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.

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.

Statistical methods are not used in this information collection.

