

Supporting Statement for Paperwork Reduction Act Submissions
Export-Import Bank of the United States
Form EIB 84-01

Additional Information related to the to the Export Import Bank's privacy policies for 3048-0013 (EIB 84-01) collection:

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

Information collected by 3048-0013 (EIB 84-01) 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, 3048-0013 (EIB 84-01) collection has been reviewed by EXIM Bank's privacy office.

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.

Response:

This is an application form for working capital loan guarantees provided by EXIM Bank. EXIM Bank is the U.S. Government agency (created by the Export-Import Bank of 1945 as amended) that facilitates the export financing of U.S. goods and services. This collection of information is necessary under Sec. 635(a) (1) to determine eligibility of applicant for EXIM Bank assistance or participation.

In addition to the existing questions on the application form, EXIM is requesting the collection of information to include additional classification questions due to the added Section 403 of the EXIM Charter.

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.

Response:

The application provides EXIM Bank staff with the information necessary to determine if the application and transaction are eligible for EXIM Bank assistance.

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.

Response:

EXIM Bank deployed a new system in FY 2021, EXIM Loan Management System ("ELMS,") that facilitates the on-line submission of working capital applications.

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.

Response:

All applications are independent of each other, i.e. no duplication. In circumstances when some information may already be on file at EXIM Bank, the application includes language allowing the application to indicate so.

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

Response:

As noted in question 11, on average the Export-Import Bank receives approximately 150 applications per year (from both medium and small businesses). To minimize the burden on these small entities, the form is accessible on-line and the agency has limited the information collected to that which is necessary for EXIM Bank to make informed decisions about the loan application. In addition, the information asked in the application is also asked within the new ELMS system mentioned in (3).

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.

Response:

The consequence to the Federal program would be that EXIM Bank would not be able to determine if an application and transaction to be guaranteed is eligible, thereby making it impossible to operate the program.

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.
- a. Collection of information is consistent with the guidelines in 5 CRF 1320.6.
- b. 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

EXIMS'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, #87874 dated 11-05-2024
No substantive comments were received.

30 Day Federal Register Notice FR Vol. 90, #2697 dated 01-13-2025

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

Response:

Delegated Authority Lenders, as approved by EXIM Bank, are entitled to retain a certain portion of the facility fee paid by the Exporter. Delegated Authority Lenders serve as one of the means by which the program is made available to the public. EXIM Bank does not provide payments or gifts to respondents as incentive to respond to this information collection.

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

Response:

EXIM Bank, and their officers and employees are subject to the Trade Secret Act, 18 U.S.C. Sec. 1905, which requires them to protect confidential information from disclosure, to the extent permitted by law. In addition, EXIM Bank's regulations at 12 CFR 404.1 provides that, except as required by law EXIM 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 provides. 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.

Response:

EXIM's answer: No sensitive questions are involved as that term is described by OMB. This information collection does contain questions concerning an applicant's criminal background in order to make sound determinations concerning an application's character.

12. Provide estimates of the hour burden of the collection of information. The statement should include: the number of respondents; frequency of response; annual hour burden; an explanation of how the burden was estimated; and the hour cost burden.

Response:

Based on the average number of loans received since this information collection was last submitted for review, the estimated annual burden information for this collection is as follows:

Annual Number of Respondents:	150
Estimated Time per Respondent:	2 hours
Annual Burden Hours:	300 hours
Frequency of Reporting of Use:	Annually

Estimated Time per Respondent is 2 hours, which takes into account ELMS online submission, access, and review of 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 11 and 13).

Response:

There are no additional costs, such as capital or startup costs associated with this information collection.

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

Response:

Reviewing time in hours	2
Responses per year	150
Review time per year	300
Average wages per hour	\$42.5
Average cost per year	\$12,750
Benefits and Overhead	20%
Total Government Cost	\$15,300

14. Explain reasons for and program changes or adjustments reported in Items 11 or 13 of the OMB Form 83-I.

Response:

The average number of responses has declined over the past three years as the private sector has become more selective with the credit risk of borrowers and the volume of revenue generated by those customers. In addition, private lenders have slowly moved away from trade finance as capital has become expensive and lenders are required to increase capital reserves due to Basel III requirements. Consequently, the burden information reported has been adjusted to reflect the decrease in responses.

15. 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.

Response:

Not applicable. Information collected is not published. Any publishing of information collected is not related to the original purpose of the application.

16. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Response:

Not applicable. We are not seeking approval not to display the expiration date.

17. Explain each exception to the certification statement in item 16.

Response:

There are no exceptions.

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.

Response:

Statistical methods are not used in this information collection.