

Supporting Statement for Paperwork Reduction Act Submissions -3048-0056

EIB 18-04 Itemized Statement of Payments-- Long-term Guarantees and Direct Loans--US Costs

Additional Information related to the to the Export Import Bank's privacy policies for **EIB 18-04** collection:

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

Information collected by this form 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, and not Personally Identifiable Information.

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

The most recent PIA applicable to the collected information is the EXIM Online (EOL) PIA, dated June 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's privacy office or staff?

Yes, this form has been reviewed by EXIM'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

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.

1. 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 review and identify the specific details of the disbursement request and ensure that the request is complete and in compliance with EXIM's disbursement requirements to determine the eligibility of the US export for EXIM support.
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 staff will review the information in this form in conjunction with disbursement documentation to determine whether to approve a disbursement request.

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 will accept this form electronically in a disbursement portal for EXIM long-term guarantee and direct loan transactions. The portal will offer EXIM's borrowers the opportunity to electronically submit a disbursement request to EXIM using this form and attaching disbursement documentation 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 EXIM transaction and disbursement request.

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

This document is completed by transaction borrowers, not small business exporters, therefore no burden minimization is necessary.

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.

Without the collection of this information, the likely result is that disbursement requests will be delayed in processing because they are incorrect or incomplete and do not conform to EXIM disbursement requirements.

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.

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 FR Vol.86, #57143dated 10-14-2021

No comments were received.

30 Day Federal Register Notice FR Vol.86, #71895dated 12-20-2021

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 payment 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.

There are no questions of a sensitive nature included in the questionnaire.

12. Provide estimates of the hour burden to the respondents for the collection of this information. The statement should include:

Annual Number of Respondents:	150
Estimated Time per Respondent:	90 minutes
Annual Burden Hours:	225 hours
Frequency of Reporting or Use:	As needed

This is submitted as needed when disbursements are requested by the borrower. The frequency of those disbursements is as needed and unknown to EXIM until receipt.

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

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

Reviewing time per response:	45 minutes
Responses per year:	150
Reviewing time per year:	112.50 hours
Average Wages per hour:	\$42.50
Average cost per year: (time * wages)	\$4781.25
Benefits and overhead:	20%

Total Government Cost: \$5,737.50

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

EXIM reduced burden hours and increased respondents. The form provides dropdown menus for the State and Country fields to standardize the spelling of each for EXIM data collection purposes. Added the reference of "Supplier" in the information title blocks and explanatory footnote.

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.

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.

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. When Item 17 on OMB Form 83-1 is checked, "Yes" the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

Statistical methods are not used in this information collection.