

Supporting Statement for Paperwork Reduction Act Submissions
OMB Form 3048-0052
EIB 15-04 Exporter's Certificate for Co-Financing Transactions

Additional Information related to the to the Export Import Bank's privacy policies for 3048-0052 (EIB 15-04) collection:

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

Information collected by 3048-0052 (EIB 15-04) 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 7, 2025. 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, 3048-0052 (EIB 15-04) 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 Bank) 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 Bank 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 export for EXIM Bank assistance.

EXIM Bank's borrowers, financial institution policy holders and guaranteed lenders provide this form to U.S. exporters, who certify to the eligibility of their exports for EXIM Bank support. For loan guarantees, the completed form is required to be submitted at time of disbursement and held by either the guaranteed lender or EXIM Bank. For MT insurance, the completed forms are held by the financial institution, only to be submitted to EXIM Bank in the event of a claim filing.

EXIM Bank uses the referenced form to obtain exporter certifications regarding the export transaction, content sourcing, and their eligibility to participate in USG programs with respect to co-financed transactions. These details are necessary to determine the value and legitimacy of EXIM Bank financing support and claims submitted. It also provides the financial institutions a check on the export transaction's eligibility at the time it is fulfilling a financing request.

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 Bank staff reviews this information to assist in determining that a specific export sale is eligible for guarantee cover.

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.

This form is provided on our website as a fillable form. Under the guarantee program the form is submitted to EXIM Bank or the guaranteed lender for review with each disbursement request. However, for Insurance, policy holders maintain possession of these forms and only submit them to EXIM Bank if it submits a claim on the transaction. A PDF or other electronic format of this form can be used to submit it to EXIM Bank.

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 export transactions are independent of each other; therefore, there is no duplication since each export corresponds to a unique financing transaction.

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

The ability to complete the form electronically and submit electronically reduces the paperwork burden on small businesses and processing time for EXIM Bank.

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 the payment of claims that are not eligible for support, and which do not conform with EXIM Bank requirements or USG restrictions.

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.

The 60-day notice was published in the Federal Register, / Vol. 90, No. 173, #43603/
Wednesday, September 10, 2025
No Comments were received.

The 30-day notice was published in the Federal Register /Vol. 90, No. 220, #51755/
Tuesday, November 18, 2025

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 Bank and its officers and employees are subject to the Trade Secrets Act, 19 USC Sec 1905, which requires EXIM 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, 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. 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. This form does not ask any questions of a sensitive nature.

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

Annual Number of respondents:	30
Estimated Time per Respondent:	30 minutes
Annual burden hours:	15 hours
Frequency of response:	as needed

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. 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 response:	5 minutes
Responses per year:	30
Reviewing time per year:	2.5 hours
Average Wages per hour:	\$42.50
Average cost per year:	\$106.25
(time * wages)	
Benefits and overhead:	20%
Total Government Cost:	\$127.50

This information collection is used for already reviewed, underwritten and approved financing transactions and is one more step in EXIM's due diligence process throughout the life of the financing. Once EXIM has made a decision to finance an export sale, the financing transaction goes through a legal analysis and documentation process before any financing may be drawn down. After the legal documentation is in place, exporters start shipping to the foreign buyer and complete this information collection in order to document the domestic and foreign content included in the export sale. The exporter is also certifying in this information collection to the exporter's compliance with a number of legal and policy requirements.

This specific information collection is submitted to EXIM with a request to disburse or guarantee the disbursement of funds. EXIM's review is compliance-based and ensures that the exporter has certified its compliance with the legal and policy requirements and has documented the amount of domestic and foreign content, so that EXIM may determine how much of the specific shipment is eligible for support. The review of the information is very simple as it entails: 1) confirming that the document is related to the specific financing transaction, 2) identifying the amount of domestic content, and 3) confirming that the certification has been signed. If the exporter indicates that the shipment is comprised of wholly domestic content, it takes less than five minutes for the experienced (15 - 20 years doing this review) professionals to review the information provided. When the exporter indicates there is some foreign content, then the review may take more time in order to confirm the mathematical calculations. On average, the compliance review associated with this information collection takes no more than five minutes.

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

No program changes were made.

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 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.

Not applicable. 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.

Not applicable. 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.