SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS

EIB 10–06, Application for Approved Finance Provider

Additional Information related to the to the Export Import Bank's privacy policies for 3048-0032 (EIB 10-06) collection:

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

   Information collected by 3048-0032 (EIB 10-06) 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, 3048-0032 (EIB 10-06) 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

Part 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 complete 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 participation in EXIM Bank lender programs.

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 form the current collection.**

This form is used by a financial institution to become an Approved Finance Provider under our short- and medium-term insurance programs and medium- and long-term guarantee programs. The information received provides EXIM Bank staff with necessary details on the business activity of the applicant and enables staff to determine if the applicant's business model qualifies them to obtain insurance and make guaranteed loans.

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 Bank accepts these applications through email technology. Staff analyzes the information submitted and checks internet sources for financial and due diligence data. Currently, it is necessary to send emails and make telephone calls to the applicant in order to collect sufficient information on which to base our management decision.

In the future, it is staff's plan to work with IT to develop an Online delivery system for this application. Development time and cost are to be determined.

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.**

EXIM Bank's pool of Approved Lenders are less likely to be small or mid-size enterprises as these entities typically do not have backgrounds in international term lending activity nor have the capital (cash) to make loans under our programs.

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 Bank guarantee programs would be unavailable to the financial provider which could hinder U.S. exports or make the cost of financing U.S. exports prohibitively expensive.

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 CRF 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. 90, No. 15365 date 04/10/2025
   30 Day Federal Register Notice Vol. 90, No. 26813 date 06/24/2025

9. **Explain any decision to provide any payment or gift 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 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 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	50 applicants
The frequency of response	On occasion
The annual hour burden	25 hours
An explanation of how the burden was estimated.	For burden calculation purposes, we assumed that it would take on average 30 minutes for respondents to complete the application. We receive, on average, 50 applications per year. Thus, the annual burden rate can be calculated as 50 applicants* 30 minutes = 25 hours.

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	50

Reviewing time (hours) per year	25 hours per year
Average wages per hour	$42.50
Average cost per year (time * wages)	$1,062.50
Benefits and overhead	20%
Total Government Cost	$1,275

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

Language was updated to remove all but electronic submission. Additional MGA programs were added that could be requested. Additional information was added to section three for the Delegated Authority Application. Application was formatted as a fillable PDF, as well as correcting typos and fixing issues with format spacing.

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.

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.