Supporting Statement for Paperwork Reduction Act Submissions
OMB Form 3048-0035
EIB 10-04 Notice of Claim and Proof of Loss, Working Capital Guarantee Agency

Additional Information related to the to the Export Import Bank's privacy policies for 3048-0035 (EIB 10-04) collection:

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

   Information collected by 3048-0035 (EIB 10-04) 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, 3048-0035 (EIB 10-04) 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.

Pursuant to the Export-Import Bank Act of 1945, as amended (12 USC 635, et seq.), the Export-Import Bank of the United States (EXIM Bank), facilitates the finance of the export of U.S. goods and services by providing insurance or guarantees to U.S. exporters or lenders financing U.S. exports. By neutralizing the effect of export credit insurance or 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. In the event that a borrower defaults on a transaction insured or guaranteed by EXIM Bank, the insured or guaranteed exporter or lender may seek payment from EXIM Bank by the submission of a claim. This collection of information is necessary, pursuant to12 USC 635 (a)(1), to determine if such claim complies with the terms and conditions of the relevant insurance policy or guarantee, as the case may be.

2. Indicate how, by whom and for what purpose the information is to be used.

   EXIM Bank offers guarantees of principal and interest on floating or fixed-rate loans by eligible lenders to creditworthy U.S. exporters to enable them to meet their working capital needs and fulfill their export sales contracts. The guarantees cover the repayment risks of the U.S. exporters exporting under their working capital line. EXIM Bank guarantees that, in the event of a payment default by the borrower, it will repay to the lender the outstanding principal and interest on the loan.

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 is currently accepting this application electronically. The online application offers the U.S. exporting community the opportunity to electronically submit a claim, 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 product. In circumstances when some information may already be on file at EXIM Bank the application includes language allowing 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.

   The electronic submission of the form reduces the paperwork burden on small businesses and processing time for EXIM Bank. Paper forms have been used in the past.

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 online forms, EXIM Bank would be unable to document proof of loss, process claims, and pay the guaranteed lender.

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 91 # 158 dated 08/18/2026

   No comments were received

   30 Day Federal Register Notice FR 91 # 210 dated 11/02/2026

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

   Not applicable. EXIM Bank does not provide any payment or gift 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, 18 U.S.C. 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 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.

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

    Provide estimates of the hour burden of the collection of information. The statement should include:

    The number of respondents for EIB 10-04: 10
    The frequency of response for EIB 10-04: As needed to request a working capital claim payment.

    Annual hour burden for EIB 10-04: 60 hours

    An explanation of how the burden was estimated:

    As working capital transactions have become more complex, EXIM Bank staff estimates that it takes approximately 6 hours for the guaranteed lender to electronically submit an application based on the time it takes to electronically input the data in the application form plus gathering and uploading the required attachments.

    6 hrs. times 10 applications yields 60 annual hours burden.

12. 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

13. Provide estimates of annualized costs to the Federal government

Reviewing time per claim:	24 hours	
Responses per year:	10	
Reviewing time per year	240 hours	
Average Wages per hour	42.50	
Average cost per year	$10,200.00	(time * wages)
Benefits and overhead	20%	
Total Government Cost	$12,240.00	

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

    For the form, there were minor language changes to maintain consistency.

    For the annualized government cost, the hours increased due to the incomplete and more complex claim submissions.

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.

    The collected information will not be published.

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.

    EXIM Bank is not seeking approval to not display the expiration date.

17. 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 collection.