

SUPPORTING STATEMENT
U.S. Department of Commerce
Economic Development Administration
Data Collection for Compliance with
Government Performance and Results Act
OMB CONTROL NO. 0610-0098

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

The Economic Development Administration (EDA) helps our partners across the nation (states, regions, and communities) create wealth and minimize poverty by promoting a favorable business environment to attract private capital investment and jobs through world-class capacity building, planning, infrastructure, research grants, and strategic initiatives.

EDA's strategic investments in public infrastructure and local capital markets provide lasting benefits for economically disadvantaged areas. Acting as catalysts to mobilize public and private investments, EDA's investments address problems of high unemployment, low per capita income, and other forms of severe economic distress in local communities. EDA also provides special economic adjustment assistance to help communities and businesses respond to major layoffs, plant shutdowns, trade impacts, natural disasters, military facility closures, and other severe economic dislocations. Through its investments, EDA helps fulfill the Administration's goal to leave no geographic area or demographic sector of our nation behind in achieving the American dream.

EDA must collect data and report on the performance of its principal programs –

- Public Works Program promotes long-range economic development in distressed areas by providing investments for vital public infrastructure and development facilities.
- Economic Adjustment Program offers flexible investments for communities facing sudden or severe economic distress, including revolving loan fund grants.
- Planning Program supports local planning and long-term partnerships with state, planning organizations, district organizations and tribal governments that assist distressed communities with strategic planning and investment activities.
- University Center Program is a partnership that draws on the expertise of local colleges and universities to help strengthen distressed communities as they strive to become economically self-sufficient.
- Trade Adjustment Assistance for Firms (TAA) Program, authorized under the Trade Act of 1974, assists U.S. firms and industries which have lost domestic sales and

experienced unemployment due to increased imports of similar or competitive goods, become more competitive in the global economy.

The Government Performance and Results Act of 1993 (GPRA) requires Federal agencies to develop performance measures and report agency performance results to Congress and their stakeholders. To comply with that law, EDA must collect specific data from grant recipients to report on its performance in meeting its stated goals and GPRA statutory objectives. The Congressionally- mandated reports are the Performance and Accountability Report and annual budgets. The performance measures are designed to evaluate overall program performance and not the performance of individual grantees. The information collected at project completion and various stages thereafter will be used to enhance the management and performance of EDA programs.

This submission is an extension and includes adjustment decreases in responses, burden hours, and cost due to a miscalculation that both the centers and clients completed the forms which led to higher numbers. Instead, it was determined that only the centers complete the forms.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

The information will be used by EDA personnel, stakeholders, and Congress to evaluate the agency's performance. The information will be used by EDA management to enhance the performance of its economic development assistance programs.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

EDA is in the process of developing an electronic processing and data collection system. Management Information System (MIS) components for grantees to electronically report GPRA data is included in the agency's overall Information Technology (IT) plan. Electronic reporting will streamline the data collection and reporting process for grantees and EDA staff.

4. Describe efforts to identify duplication.

EDA reviews existing data collection to ensure that there is no duplication. The information requested is unique to EDA program performance goals and measures, and is not collected elsewhere.

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

There is no significant impact on small businesses or other small entities.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

If this information were not collected, EDA could not fulfill its statutory mandate. Due to reductions in staffing and budgetary constraints, EDA must rely on data collection in lieu of individual project site visits.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

There are no special circumstances.

8. Provide the information of the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A Federal Register Notice soliciting public comment was published on April 15, 2008 (Vol. 73, pg. 20245). No comments were received.

EDA consulted with its six Regional Offices and the Directors of the TAA Centers in order to clarify the data and data process which led to the adjustments in this submission

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

No gift or payment is provided to any respondent.

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

The information furnished does not require an assurance of confidentiality, and may be supplied to individuals or organizations requesting such information under the Freedom of Information Act.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

There are no questions of sensitive nature.

12. Provide an estimate in hours of the burden of the collection of information.

Burden requirements for the various performance reporting forms are:

ED-915 - Public Works, and Economic Adjustment Infrastructure and Revolving Loan Fund Investment Reporting Form: The estimated cost to a respondent is \$410, based on an average labor cost of \$42/hour times 8 hours equals \$336.00, plus \$74.00/response for non-labor costs, which includes equipment, printing, postage, and overhead, equals \$410.

| | | | |
|----------------------------------|--------------------------------|---------------------------|-----------------------|
| 950 responses @ 8 hours/response | = | 7,600 burden hours | |
| 950 responses @ | \$42/Hr x 8 Hrs=\$336/response | | =\$319,200 labor cost |
| | per year | | |
| 950 responses @ | | \$ 74/response | = \$ 70,300 |
| | non-labor costs | | |
| | \$410 | | \$389,500 total |

ED-916 - Economic Development District and Indian Tribe Reporting Form: The estimated cost to a respondent is \$326, based on an average labor cost of \$42/hour times 6 hours equals \$252, plus \$74/response for non-labor costs, which includes equipment, printing, postage, and overhead, equals \$326.

| | | | |
|----------------------------------|--------------------------------|---------------------------|------------|
| 518 responses @ 6 hours/response | = | 3,108 burden hours | |
| 518 responses @ | \$42/Hr x 6 Hrs=\$252/response | | =\$130,536 |

| | | |
|-----------------|------------------------------------------------|------------------------------------------------|
| 518 responses @ | labor cost per year \$ 74/response \$326 | = \$ 38,332 non-labor costs \$168,868 total |
|-----------------|------------------------------------------------|------------------------------------------------|

ED-917 - University Center Reporting Form: The estimated cost to a respondent is \$368, based on an average labor cost of \$42/hour times 7 hours per response equals \$294, plus \$74/response for non-labor costs, which includes equipment, printing, postage, and overhead, equals \$368. The number of responses has decreased significantly from the last estimate (2005) since experience has shown that only the University Centers, rather than their clients, complete the form.

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|---------------------------------|--------------------------------|-------------------------|-----------------|
| 51 responses @ 7 hours/response | = | 357 burden hours | |
| 51 responses @ | \$42/Hr x 7 Hrs=\$294/response | | = \$14,994 |
| | labor costs per year | | |
| 51 responses @ | \$ 74/response | | = \$ 3,774 non- |
| | labor costs | | |
| | \$368 | | \$18,768 total |

ED-918 - Trade Adjustment Assistance Reporting Form: The estimated cost to a respondent is \$326 based on an average labor cost of \$42/hour times 6 hours per response equals \$252, plus \$74/response for non-labor costs, which includes equipment, printing, postage, and overhead, equals \$326. . The number of responses has decreased significantly from the last estimate (2005) since experience has shown that only the TAA Centers, rather than their clients, complete the form.

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|---------------------------------|--------------------------------|------------------------|-----------------|
| 11 responses @ 6 hours/response | = | 66 burden hours | |
| 11 responses @ | \$42/Hr x 6 Hrs=\$252/response | | = \$2,772 labor |
| | costs per year | | |
| 11 responses @ | \$ 74/response | | = \$ 814 non- |
| | labor costs | | |
| | \$326 | | \$3,586 total |

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in #12 above).

Not Applicable.

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

The estimated annual cost to the Federal government is \$413,100 based on 1,530 responses. This estimate is based on 6 hours per response of professional and support time at \$45.00 per hour including the cost of equipment, printing and overhead.

15. Explain the reasons for any program changes or adjustments.

This submission includes an adjustment decrease in responses, burden hours, and cost due to a miscalculation that both the centers and clients completed the forms which led to an exaggerated numbers. Instead, it was determined that only the centers complete the forms. Responses, decreased by 1,207 from 2,737; burden hours, decreased by 8,630 from 19,768; and burden cost, decreased by \$73,780 from \$187,000.

16. For collections whose results will be published, outline the plans for tabulation and publication.

In compliance with the GPRA, the collected information will be published in aggregate form in the Performance & Accountability Report and annual budgets. Data will not be published by individual project.

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

Not Applicable.

18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I.

There are no exceptions to the certification statements identified in item 19.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

EDA does not employ statistical methods.