

SUPPORTING STATEMENT
U.S. Department of Commerce
Economic Development Administration
APPLICATION FOR INVESTMENT ASSISTANCE
OMB CONTROL NO. 0610-0094

A. JUSTIFICATION

This request is to extend the OMB approval for this information collection.

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

The mission of the Economic Development Administration (EDA) is to lead the federal economic development agenda by promoting innovation and competitiveness, preparing American regions for growth and success in the worldwide economy. EDA provides investments that will help 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 higher skill, higher wage jobs through capacity building, infrastructure, research and technical assistance.

EDA administers the following investment programs through its six regional offices -

Public Works and Economic Development

Public Works and Economic Development Program investments help support the construction or rehabilitation of essential public infrastructure and facilities necessary to generate or retain private sector jobs and investments, attract private sector capital, and promote regional competitiveness, including investments that expand and upgrade infrastructure to attract new industry, support technology-led development, redevelop brownfield sites and provide eco-industrial development.

Economic Adjustment Assistance

The Economic Adjustment Assistance Program provides a wide range of technical, planning and infrastructure assistance in regions experiencing adverse economic changes that may occur suddenly or over time. This program is designed to respond flexibly to pressing economic recovery issues and is well suited to help address challenges faced by U.S. regions and communities.

Research and National Technical Assistance

The Research and National Technical Assistance Program supports research of leading, world class economic development practices, and funds information dissemination efforts.

Local Technical Assistance

The Local Technical Assistance Program helps fill the knowledge and information gaps that may prevent leaders in the public and nonprofit sectors in economically distressed regions from making optimal decisions on local economic development issues.

Planning

The Planning Program helps support planning organizations, including District Organizations and Indian Tribes, in the development, implementation, revision or replacement of comprehensive economic development strategies (CEDDS), and for related short-term planning investments and State plans designed to create and retain higher-skill, higher-wage jobs, particularly for the unemployed and underemployed in the nation's most economically distressed regions.

University Center Economic Development

The University Center Economic Development Program is a partnership between the Federal government and academia that helps to make the varied and vast resources of universities available to economic development communities.

Trade Adjustment Assistance for Firms

EDA administers the Trade Adjustment Assistance for Firms Program through a national network of eleven Trade Adjustment Assistance Centers to help manufacturing and production firms, which have lost domestic sales and employment due to increased imports of similar or competitive goods, become more competitive in the global economy.

The information contained in the Application for Investment Assistance, Form ED-900, is necessary for EDA to evaluate whether proposed projects satisfy eligibility and programmatic requirements contained in EDA's authorizing legislation, the Public Works and Economic Development Act of 1965, as amended (42 U.S.C. 3121 *et seq.*) (PWEDA), the accompanying regulations codified in 13 C.F.R. Chapter III, and the applicable Announcement of Federal Funding Opportunity (FFO).

EDA is interested in investment applicants who meet or exceed their investment policy guidelines.

2. Indicate how, by whom, and for what purpose the information is to 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 contained in the ED-900 is used by EDA personnel to evaluate and competitively select proposed projects for investment assistance. The information is also used

by EDA to make final determinations regarding investment funding and to finalize the terms and conditions of the investment award, including but not limited to the scope of work and non-federal share and other funding commitments for the project.

The information collected will not be disseminated to the public.

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.

EDA is fully compliant with the government-wide mandate to post all grant opportunities on www.grants.gov. All of EDA's grant opportunities are posted on both the Find and the Apply sections of www.grants.gov. The ED-900 also is posted on the agency's website at www.eda.gov and can be completed and submitted via the Internet.

EDA also accepts applications via email and in hardcopy format.

4. Describe efforts to identify duplication.

EDA is unaware of any duplication with respect to this information collection. EDA periodically reviews its information collections to ensure that there is no duplication.

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

Pursuant to EDA's authorizing legislation and regulations, eligible applicants and eligible recipients of EDA investment assistance include "small businesses" or "small entities" as defined by the Regulatory Flexibility Act (5 U.S.C. 601(6)). Accordingly, this information collection potentially involves small businesses or other small entities. As part of this PRA process, EDA has conducted a thorough review of its forms and other information collections to minimize respondent burden. EDA collects only the minimum amount of information to effectively administer its programs and to monitor compliance with PWEDA and EDA's regulations.

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

EDA would not be able to fulfill its statutory mandate if the information collection is not conducted. This information is only collected once, at the time of application.

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

Not Applicable.

8. Provide a copy 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 the 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.

On November 7, 2008, a Federal Register Notice (Vol. 73, pg. 66217) soliciting public comments on this information collection. No comments were received.

During the development of the ED-900, EDA formed working groups with members from its six regional offices and headquarters to evaluate current procedures and information collections to ensure that they are consistent with the law, efficient, and meet agency needs in a manner that minimizes the burden on EDA clients. The regional offices provided not only their perspective, but also that of applicants and grantees; nearly all of the regional office staff that participated in this exercise had assisted applicants with completing the precursors to the ED-900.

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

No gifts or payments are provided to any respondent.

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

There is no assurance of confidentiality provided to respondents of this information collection. While information submitted by a respondent to EDA is generally subject to public disclosure, EDA does not publicly release confidential business information, including trade secrets and confidential commercial or financial information, to the extent that such information is exempt from public disclosure under the Freedom of Information Act (FOIA). *See* 5 U.S.C. 552(b)(4).

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 collection of information does not request information of a sensitive nature.

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

When initially requesting OMB approval for this information collection, EDA estimated that the average applicant would spend 21.66 hours completing the application package. Since EDA is requesting an extension without change and since EDA has not received any feedback from applicants indicating that this estimate is inaccurate, EDA believes this estimate to be valid.

This estimate was calculated using the following methodology:

The staff from the Denver Regional Office and the Atlanta Regional Office provided estimates of the amount of time it would take to fill out each section of the ED-900. EDA used these estimates to prepare estimates for each type of applicant. Then EDA used data from its Operations, Planning, and Control System (OPCS) to estimate the number of applicants in each category and the percentage of applicants that would be required to provide additional documentation. By multiplying the expected number of applicants in each category by the average number to complete an application for that category of applicant, EDA was able to estimate the total applicant burden.

Applicant burden (hours)					
Category	Estimated number of applicants	Estimated time to complete application	Percentage of applicants receiving further consideration	Estimated time to provide additional materials if receiving further consideration	Total time to complete
Public Works	210	16.85	65.31%	20.45	6,343.31
Economic Adjustment/construction	37	19.18	84.51%	20.45	1,349.21
Economic Adjustment/nonconstruction-non RLF	90	16.38	84.57%	2.30	1,649.56
Economic Adjustment/RLF	5	18.38	100.00%	8.45	134.17
Partnership Planning	386	16.28	97.47%	1	6,661.60
Short-term Planning	37	16.92	80.17%	2.45	698.59
University Center	83	17.75	67.70%	2.45	1,610.92
Local Technical Assistance	21	16.75	81.82%	2.45	393.85
National Technical Assistance and Research/Evaluation	6	16.75	100.00%	2.45	115.20
Total	875				18,956.40
			Avg. time to complete		21.66

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

875 responses @ 21.66 hours each = **18,952.5 (18,953)** burden hours

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

The estimated annual cost to the Federal government with respect to this information collection is \$1,496,250 based on 875 responses. This estimate is based on 38 hours of professional and support time at \$45 per hour.

875 responses @ \$1,710 each = **\$1,496,250 per year**

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

There are no program changes or adjustments.

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

Specific details of information collected from respondents will generally not be published. However, some of the information collected may be published in aggregate form as part of EDA's annual report, Government Performance and Results Act reporting, EDA's Balanced Scorecard or other summary reports.

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

Not Applicable.

18. Explain each exception to the certification statement.

No exceptions are requested.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection does not employ statistical methods. EDA is not aware of any statistical sampling methods that might reduce burden or improve the accuracy of results.