

SUPPORTING STATEMENT
U.S. Department of Commerce
Economic Development Administration
REQUEST TO AMEND AN INVESTMENT AWARD
AND PROJECT SERVICE MAPS
OMB CONTROL NO. 0610-0102

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.

A recipient must submit a written request to EDA to amend an investment award and provide such information and documentation as EDA deems necessary to determine the merit of altering the terms of an award (see 13 CFR 302.7(a) of EDA's regulations). EDA may require a recipient to submit a project service map and information from which to determine whether services are provided to all segments of the region being assisted (see CFR 302.16(c) of EDA's regulations).

The type of documentation varies by the amendment requested. For example:

1. A change to the approved schedule may require documentation substantiating claims that weather caused delays, or labor shortages caused delays, or environmental issues unknown at the time of award caused delays, etc. It depends on what reason the recipient is citing for the delay.
2. A change to the scope of work may require almost a mini-application explanation why the change is in the best interest of both the government and the recipient and what impact the change will have on project outcomes.
3. A budget request may require documentation showing that materials were more expensive than originally budgeted and substitutes were not available.

Upon receiving an amendment request, the EDA engineer/construction manager assigned to the project will evaluate the request and determine what type of documentation is required. The EDA engineer/construction manager will then communicate this to the recipient.

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.

Written requests to amend an investment award will be used by EDA personnel to determine whether a change to the approved scope of work, a change to the approved schedule, or a change in EDA financing is appropriate. Any increases in EDA funding or changes to project scope or schedule require EDA approval.

Project service maps will be used by personnel to determine whether services are being provided to all segments of the region assisted.

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 requires that amendment requests be submitted in hardcopy. Project service maps may be submitted electronically or 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 Public Works and Economic Development Act 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. Projects not conforming to the approved statement of work, approved schedule, and approved financing would be in violation of the terms and conditions of the award and would have to be terminated for cause, leading to a sharp uptick in unfinished projects. The result would be fewer economic benefits.

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 January 22, 2009, a Federal Register Notice (Volume 74, Number 13, Pages 3986-3987) was published to solicit public comments on this information collection. No comments were received.

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.

| | |
|--|--------------|
| 600 requests for amendments to construction awards/year * 2 hours to prepare each request for an amendment to a construction award | =1,200 |
| + 30 requests for amendment to non-construction awards/year * 1 hour/request | = 30 |
| + 2 project service maps/year * 6 hours/map | = 12 |
| TOTAL HOURS | 1,242 |

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 Question 12).

The cost for postage to submit the required documents is estimated as follows:

$$632 \text{ responses} \times \$0.44 = \$278$$

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

The estimated annual hourly burden on the Federal government with respect to this information collection is as follows:

| | |
|--|--------------|
| 600 requests for amendments to construction awards/year * 2 hours to prepare each request for an amendment to a construction award | =1,200 |
| + 30 requests for amendment to non-construction awards/year * 1 hour/request | = 30 |
| + 2 project service maps/year * 1 hour/map | = 6 |
| | <u>1,236</u> |

The cost is 1,236 hours * \$45/hour = \$55,620

Explain the reasons for any program changes or adjustments reported.

The difference between previous estimates of 55 responses for 540 hours, and the current estimate of 632 responses for 1,242 hours is a combination of an underestimation of responses and overestimation of the complexity of requests.

The ROCIS system is showing \$0 cost burden increase for the previous submission due to rounding off when migrating the collection to ROCIS. The system allows the actual cost increase of \$278 to be recorded.

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. No forms are involved with this collection of information.

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. .