

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 Office of Management and Budget approval of this information collection to allow for its use in conjunction with grants made under the Community Trade Adjustment Assistance Program, established by the amendments to the associated with amendments to the Trade and Globalization Adjustment Assistance Act.

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.

The Trade and Globalization Adjustment Assistance Act (TGAAA), part of the American Recovery and Reinvestment Act of 2009, amended chapter 4 of the Trade Act of 1974 to establish the Community Trade Adjustment Assistance (Community TAA) Program, which is designed to assist U.S. communities suffering negative effects from trade impacts. To participate in the program, communities first must petition for EDA's affirmative determination that they are a community significantly impacted by trade (Impacted Community). Once EDA makes an affirmative determination, an Impacted Community may apply for planning and/or project implementation grants. EDA will require that communities wishing to petition for such a determination use the OMB-approved Standard Form 424 (SF-424), Application for Federal Assistance, on which to process petitions to ensure transparency and consistency. Since the implementation portion of the Community TAA Program is similar to EDA's existing economic development planning and construction programs, EDA plans to require communities that have received this affirmative determination to use the existing Form ED-900 on which to process grant applications, Application for Investment Assistance, to request planning and/or project implementation assistance.

An emergency approval was granted by OMB on August 12, 2009 to ~~The information collection information for Form ED-900 must be~~ add the Community TAA Program to this information collection. This request is required to extend the approval for the standard OMB three-year approval period.

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EDA also administers the following investment programs through its headquarters and six regional offices:—

(1) Public Works and Economic Development - helps 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.

(2) Economic Adjustment Assistance - provides a wide range of technical, planning and infrastructure assistance in regions experiencing adverse economic changes that may occur suddenly or over time.

(3) Research and National Technical Assistance - supports research of leading, world class economic development practices, and funds information dissemination efforts.

(4) Local Technical Assistance - 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.

(5) Planning - helps support planning organizations, including District Organizations and Indian Tribes, in the development, implementation, revision or replacement of comprehensive economic development strategies (CEDS), 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.

(6) University Center Economic Development - a partnership between the Federal government and academia that helps to make the varied and vast resources of universities available to economic development communities.

[EDA uses Form ED-900 to provide access to all of its grants-based economic development programs.](#) The information contained in 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). The programs authorized under PWEDA generally are called the Economic Development Assistance Programs (EDAP). [OMB has approved the use of Form ED-900 for the purpose of evaluating whether proposed EDAP projects satisfy these requirements. March 31, 2012.](#)

~~EDA is also requesting that~~ Form ED-900 ~~also will be used be authorized for an additional~~
~~purpose~~ to evaluate whether proposed projects satisfy eligibility and programmatic requirement
contained in chapter 4 of the Trade Act, which establishes the Community TAA Program, EDA'
regulations as set out at 13 C.F.R. part 313, and the applicable FFO. EDA ~~will give priority to~~
~~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 Form ED-900 is used by EDA personnel to evaluate and competitively select proposed projects for investment assistance for EDAP and the Community TAA Program. The information also is 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. Form ED-900 is also posted on www.grants.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 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, ~~the Trade 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 be unable 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 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 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.

[\[\[\[Insert after\]\]\]The Federal Register Notice](#) soliciting public comment was published on December 23, 2009 (Volume 74, pg. 68226). [No comments were received](#) regarding [this notice](#).

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 generally is 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.

EDA's existing estimate for EDAP will not change.

To estimate burden under the Community TAA Program, EDA examined its experience with its public works and economic adjustment assistance programs, which are authorized under PWEDA. The potential demand for programs under PWEDA is, of course, much greater because eligibility is based on general economic distress and is not restricted to trade impact. EDA estimates that demand from trade-impacted areas would constitute a small fraction of all areas experiencing economic distress. ~~Nonetheless, to a certain extent, demand will be elastic depending on the amount of appropriations Congress and the President approve for the Community TAA Program. Also, a much smaller amount of funding has been appropriated for the Community TAA Program, compared with EDAP.~~ Because of the current state of the U.S. economy and the fact that the program is nationwide, EDA estimates that it may receive about 350 responses for a petition for affirmative determination and 300 responses for an implementation grant. The estimated number of petitions is greater than the estimated number of grant applications because EDA believes that some communities that petition may not follow through with a grant application.

This estimate was calculated using the following methodology:

- (a) *Petitions for Certification Affirmative Determination.* EDA first must make an affirmative determination that a community is an Impacted Community using information submitted on Form ED-900 and SF-424. Petitions for EDA's affirmative determination are designed to be minimally burdensome on communities. They involve two items. First, the community must have a "Cognizable Certification," which means that the community has had a group of workers, farmers, or a firm certified to receive assistance under another TAA program. EDA will maintain an updated list of TAA for Firms - Cognizable Certifications and ~~will provide this part of the petition for the community applicants may easily access TAA for Workers Cognizable Certifications via the Department of Labor's online database. To date, there have been no Cognizable Certifications under the TAA for Farmers Program.~~—Second, the community must submit Form SF-424. They must complete Items 1-16 and 21 of Form SF-424. For At Item 15 of Form SF-424, which allows for attachments, petitioning communities will be required to complete and submit a formula provided by EDA using their Civilian Labor Force (CLF) data, which is readily available from the Bureau of Labor Statistics. They also must provide a brief narrative describing the threat to, or loss of, jobs associated with a Cognizable Certification at Item 15. Recipients do not have to complete Items 17, 18, and 19 of Form SF-424. The burden hours to complete SF-424 are not included in this request. EDA estimates that completion of a petition for an affirmative determination will take approximately 1 hour and 30 minutes.

(b) *Implementation Grant Applications.* Because of the wide range of activities that an implementation grant may support, EDA estimates that completing an implementation grant application using Form ED-900 will be similar to applying for a grant under EDAP. ~~OMB approved EDA’s estimate that the~~ ~~When initially requesting OMB approval for Form ED-900, EDA estimated that the~~ average applicant would spend approximately 21 hours, 40 minutes² to complete ~~the Form ED-900 application package~~. Since EDA is accommodating applications under the Community TAA without any change to the collection document, and has not received any feedback from applicants indicating that this estimate is inaccurate, EDA believes this estimate to be valid.

| | Estimated number of applicants | Estimated time to complete application | Total time to complete |
|--|--------------------------------|--|-----------------------------------|
| Petition for affirmative determination | 350 | 1 hr 30 mins | 525 hours |
| Implementation grant application | 1,175 | 21 hrs 40 mins ² | 25,450 600 hours |
| Totals | 1,525 | | 25,975300 hours |

The inclusion of the Community TAA Program’s respondents/responses and burden hours are reflected in the above chart.

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 above).

Not Applicable.

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

The estimated total annualized costs to the Federal government for these information collections are approximately **\$2,095,875**.

(a) *Petition by Affirmative Determination:* **\$86,625 per year.** For petitions for EDA’s affirmative determination, EDA will use the approved Form SF-424 combined with the cost-per-hour estimate for EDA professional and support time approved for Form ED-900, which is \$45 per hour. EDA estimates that it will take 5.5 hours of professional and support time for EDA to review and approve or disapprove a petition. This estimate is based on 5.5 hours of professional and support time at \$45 per hour. 350 responses @ \$247.50 each * ~~350 responses~~ = ~~\$~~ \$86,625.

(b) *Implementation Grant Applications*: **\$2,009,250 per year**. For implementation grant applications, EDA will use the approved estimate for Form 900. The estimated annual cost to the Federal government with respect to this information collection is \$1,111,500 based on an additional 300 responses. This estimate is based on 38 hours of professional and support time at \$45 per hour. 1,175 responses @ \$1,710 each - ~~=\$~~ \$2,009,250.

program changes or adjustments reported.

The adjustment decrease is due to a correction in the estimated time per response.-

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.