# 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 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 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.

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; the ED-900 expires on May 31, 2013.

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

The information contained in Form ED-900 is used by EDA personnel to evaluate and competitively select proposed projects for investment assistance for EDAP. 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. <u>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</u>.

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 also is posted on www.grants.gov and can be completed and submitted via the Internet. EDA also accepts applications 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. <u>If the collection of information involves small businesses or other small entities, describe</u> the methods used to minimize burden.

Small businesses are not eligible for Public Works and Economic Adjustment assistance and therefore are not affected by this information collection.

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

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.

The 60 day PRA Federal Register Notice is appended. No comments were received for 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. <u>Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.</u>

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. <u>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.</u>

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 updated its estimate to reflect more current application data. EDA's previous estimate of 1,408 responses stemmed from data observed in 2007, when EDA modified its application process to change the point in time in the approval process when it receives supplemental documents. For the current estimate of 1,261 respondents EDA used average EDAP application data from 2009 to 2011.

OMB approved EDA's estimate that the average applicant would spend approximately 23.75 hours completing the ED-900. Since EDA is requesting a renewal without any change to the collection document, and since EDA has not received any feedback from applicants indicating that this estimate of 29,949 hours is inaccurate, EDA believes this estimate to be valid.

# 13. <u>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).</u>

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 **\$2,156,880** (based on 38 hours of professional and support time at \$45 per hour; 1,261 responses at \$1,710 each).

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

Not Applicable.

## 16. <u>For collections whose collections will be published, outline the plans for tabulation and publication</u>.

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.