SUPPORTING STATEMENT
ECONOMIC DEVELOPMENT ADMINISTRATION
APPLICANT COLLECTION FOR "FY15 IMCP FEDERAL INTERAGENCY COMPETITION ELECTRONIC APPLICATION TOOL"

A. JUSTIFICATION

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

The Economic Development Administration (EDA) has been asked by the White House to lead an initiative in partnership with the National Economic Council entitled Investing in Manufacturing Communities Partnership (IMCP). IMCP is a government-wide initiative aiming to assist communities in cultivating an environment for businesses to create well-paying manufacturing jobs in regions across the country and thereby accelerate the resurgence of manufacturing. The IMCP is designed to reward communities that demonstrate best practices in attracting and expanding manufacturing by bringing together key local stakeholders and using long-term planning that integrates targeted public and private investments across a community's industrial ecosystem to create broad-based prosperity. Research has shown that vibrant ecosystems may create a virtuous cycle of development for a key technology or supply chain through integrated investments and linkages among the following elements: Workforce and training; Supplier network; Research and innovation; Infrastructure/site development or redevelopment; Trade and international investment; and Operational improvement and capital access.

EDA must collect data from applicants who are applying for designation status. Designation as an IMCP manufacturing community will be given to communities with the best strategies for designing and making such investments in public goods. The Federal agencies participating in the IMCP are the: Department of Commerce, Economic Development Administration; Department of Commerce, National Institute of Standards and Technology; Department of Defense; Department of Education; Appalachian Regional Commission; Delta Regional Authority; Department of Energy; Department of Housing and Urban Development; Department of Labor; Department of Transportation; Environmental Protection Agency; National Science Foundation; Small Business Administration; and the Department of Agriculture (each an IMCP Participating Agency, and collectively the IMCP Participating Agencies).

The authority for this information collection is the Public Works and Economic Development Act of 1965, as amended (42 U.S.C. § 3121 et seq.)

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, explain how the collection complies with all applicable Information Quality Guidelines.**

EDA will collect the information yearly (or as prescribed by the corresponding Federal Register Notice) via OMB MAX which is an electronic survey instrument managed by the Office of Management and Budget (OMB). Information gathered via OMB MAX will be used to analyze and assess whether candidates for IMCP designation have met the requirements and are among the top 12 applicants for the competition.

Members of the participating agencies will form a review panel. The panel will be split into teams, with each team reviewing a different subset of the application pool.

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.**

In the first round of IMCP, conducted in the first half of 2014, EDA collected applications primarily via email; however, this method did not provide for a uniform method of collecting information. Further, it created an undue burden on both the applicant and the recipient – for the applicant, the burdens included multiple document attachment and reformatting documents in a size that is compatible for e-mail submission and for the reviewer, applications were submitted in many different formats causing the reviewers to spend additional time finding criterion elements for review.

EDA will now utilize the OMB MAX information system as a more effective way to gather information. OMB MAX Information System is an electronic survey instrument managed by the Office of Management and Budget (OMB). OMB uses the MAX Information System to collect, validate, analyze, model, collaborate with agencies on, and publish information relating to its government-wide management and budgeting activities. This streamlined process is more effective for both the applicant and the reviewer. Further, OMB is working on measures in the OMB MAX system to compress the applicants' information in a PDF format.

4. **Describe efforts to identify duplication.**

To our knowledge, this online information collection is a unique project. We do note that: (a) in IMCP Round 1, similar information was requested from applicants, but applicants were permitted to submit the information, in narrative form, via email, fax or mail; and (b) the online tool, technology-wise, is based on

the online tool used for Promise Zones competition administered by the Department of Housing and Urban Development, but the information being collected is different.

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 less frequently.**

The purpose of the initiative will be frustrated if there are not opportunities for communities across the nation to apply for IMCP designation. Communities are designated yearly; however, designation is of tremendous impact to our nation's economic development and global competitiveness.

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

NA.

8. **Provide a copy of the 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.**

This is not applicable since the Federal Register Notice has not been published. This request is for an emergency clearance of this PRA package. EDA will submit a package for regular clearance, and include with that a notice to the public, at a future date.

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

No payments or gifts has been or will be given to any respondents.

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.**

All information is collected via an electronic medium that is electronically operated. For this year's competition round, EDA is projecting 80 responses where each respondent will spend 10 hours on the application process. Based on past data collection from EDA with an hourly rate of $42, the estimated cost to a respondent to prepare the electronic application is a one-time cost of $ $420, based on an average labor cost of $42/hour times 10 hours, which equals $420. There are no non-labor costs to a respondent (which includes equipment, printing, postage and overhead) associated with the collection.

80 responses x 10 hours/responses = 800 burden hours.

800 hours x $42/hour = $420/response =$33,600 per year labor.

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 Question 12 above).**

There is $0 cost to the respondents and/or record-keepers resulting from collection (other than that detailed in Question 12).

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

The estimated annual cost to the Federal government is $22,400 – 27,520. The estimate is based on the interagency review panel consisting of 15-20 GS 12/13 employees from all of the IMCP Participating agencies. We are projecting 80 applications for this competition round and each application needing 8 hours of review.

Estimated average cost:

80 responses x 8 hours = 640 hours of application review.

640 hours of application review x $35-43/hour of review by Federal Employees GS 12/13 =$22,400 - $27,520 per year labor.

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

This is a new information collection.

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

The only results that will be published are the names and projects of the top 12 designated communities. Tabulations and points will not be published but can be provided to the requesting community candidate once the competition has closed and the top 12 communities have been designated.

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.

NA.

18. Explain each exception to the certification statement.

NA.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection will not involve statistical methods.