

SUPPORTING STATEMENT
U.S. Department of Commerce
Economic Development Administration
FY15 IMCP Federal Interagency Competition Electronic Application Tool
OMB Control No. 0610-0107

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).

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, then 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.

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 uniformed 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.

EDA opens each round of applications once thereby creating only one opportunity for submission. Further, OMB MAX system creates a special token for each applicant and will only allow one submission per applicant.

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 or is 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, the impact of 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.

There are no special circumstances that would cause any information collected in a manner inconsistent with OMB guidelines. Further, the system EDA is utilizing to collect the information is a tool administered by OMB.

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 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.

On January 29, 2015, a Federal Register Notice (Volume 80, Number 19, Pages 4856-4868) 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 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. $80 \text{ responses} \times 10 \text{ hours/response} = 800 \text{ burden hours}$. $800 \text{ hours} @ \$42/\text{hour} = \$33,600 \text{ per year labor}$

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 #12).

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

There estimated annual cost to the Federal government is \$22,400 to 27,520. The estimate is based on the interagency review panel consisting of 15-20 GS 12/13 employees. 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 to \$27,520 per year labor.

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

There are no changes or adjustments.

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.

EDA is not seeking approval to not display the expiration date of OMB approval for the information collections.

18. Explain each exception to the certification statement.

There are no exceptions to the certification statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

The Economic Development Administration does not employ statistical methods to collect data using OMB MAX Information Systems.