

SUPPORTING STATEMENT
U.S. Department of Commerce
Economic Development Administration
APPLICATION FORMS FOR EDA INVESTMENT ASSISTANCE
OMB CONTROL NO. 0610-0094

A. JUSTIFICATION

This request is for Office of Management and Budget approval to revise 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 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.
- (7) Regional Innovation Strategies – a new program authorized under America COMPETES, which advances robust regional innovation cluster strategies that create a blueprint for improving the conditions or “ecosystem” in which innovative companies and entrepreneurs can accelerate the development of new businesses, products or services.

The information collected through these forms 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 Trade Act of 1974, Sections 26 and 27 of the Stevenson-Wydler Act, EDA's accompanying regulations codified in 13 C.F.R. Chapter III, and the applicable Announcement of Federal Funding Opportunity (FFO).

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.

The information contained in these forms are used by EDA personnel to evaluate and competitively select proposed projects for investment assistance for EDA's programs. 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. EDA is working with [grants.gov](http://www.grants.gov) staff to ensure the new forms are 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 conducted extensive review via internal working groups 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 entities" as defined by the Regulatory Flexibility Act (5 U.S.C 601(6)). Accordingly, this information collection potentially involves 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, Stevenson-Wydler, 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. 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. 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.

The estimate was calculated using the following methodology:

First, staff from EDA Headquarters and six Regional Offices provided estimates of the amount of time it would take to fill out each form and relevant sub-sections. The average estimates were as follows:

Form/Component	Average Time Estimate (hrs)
ED-900 - General Application for EDA Programs, Section A: General Information	7.9
ED-900 - General Application for EDA Programs, Section B: Regional Eligibility	2.0
ED-900 - General Application for EDA Programs, Section C: Budget and Staffing	3.8
ED-900 - General Application for EDA Programs, Section D: Administrative Requirements	2.4
ED-900 - General Application for EDA Programs, Section E: Requirements for Non-Governmental Applicants	2.4
ED-900A - Additional EDA Assurances	1.0
ED-900B - Beneficiary Information Form	3.4
ED-900C - EDA Application Supplement for Construction Programs	12.7
ED-900D - Requirements for Design and Engineering Assistance	3.9
ED-900E - Calculation of Estimated Relocation and Acquisition Expenses	0.7
ED-900F - Supplement for Revolving Loan Fund Applications	4.6
ED-900P - Proposal for EDA Assistance, Section I: General Information	4.8
ED-900P - Proposal for EDA Assistance, Section II: Construction Information	4.2
Environmental Narrative Template and Application Certification Clause	13.4

Second, EDA used these estimates to prepare estimates for each type of application. Data from EDA’s Operations, Planning, and Control System (OPCS) was used to estimate the number of applications in each category:

Application Type	Estimated Number of Responses	Average Time Estimate	Total Hours
Proposal Submission for Non-Construction Applicants	448	4.8	2140.4
Proposal Submission for Construction Applicants	263	4.2	1109.0
Full Application Submission for Construction Applicants	99	43.0	4246.6
Full Application Submission All Other EDA Programs	737	17.1	12579.2
Full Application Submission for Non-Profit Applicants	125	19.5	2436.9
TOTAL	1672		22,512
Average Applicant Burden			13.46

By multiplying the expected number of applicants in each category by the average time to complete an application for that category of applicant, EDA was able to estimate the total applicant burden and average applicant burden.

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 **\$2,859,120** (based on an average of 38 hours of professional and support time at \$45 per hour; 1672 responses @ \$1,710 each).

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

In 2014, EDA underwent a comprehensive review and improvement effort for its grants cycle process. Using staff input, and results from EDA’s 2014 Customer Service survey, EDA reimagined its grants application process from the ground up, making significant improvements for both stakeholders and staff. As part of this process, EDA is making changes to its forms to address the following concerns:

- Confusion among applicants regarding which sections of the ED-900 needed to be completed for the program they were applying for;
- Undue burden on applicants to complete the application form for projects that were not likely to be funded;
- Outdated links to external sources;
- Unnecessary waste of paper and ink when a complete application was printed, since sections that may not be required for a particular program were printed along with those that were required.

In order to address these concerns, EDA is dividing the ED-900 into a suite of smaller forms that can be mixed and matched to fit the needs of different program solicitations on grants.gov. This will ensure that applicants only see the information they are required to provide in order to apply and eliminate the unnecessary waste of paper and ink resources. In addition, EDA has developed a new “Proposal” form, which will allow applicants to submit significantly less information to EDA in order to get a better understanding of the potential competitiveness of their application. The following is a crosswalk of the currently approved ED-900 with the proposed new forms:

Proposed New Form	Content of the Form	Relevant Sections of the Existing ED-900
ED-900 - General Application for EDA Programs	Questions that pertain to all EDA programs, including Project Narrative questions (geographic coverage, scope of work, potential impacts), budget narrative, and eligibility questions.	Sections A, B, C, D, E, K
ED-900A - Additional EDA Assurances	Specific assurances that applicants need to provide in order to apply for EDA funding.	Exhibits B, C, and D
ED-900B - Beneficiary Information Form	Specific assurances required from beneficiaries of EDA funding, including documentation of estimated jobs and private investment resulting from the EDA project.	Exhibit A
ED-900C - EDA Application Supplement for Construction Programs	Information required from construction applicants as part of a full application after the proposal has been approved.	Section M, except questions included in the ED-900P Proposal Form.
ED-900D - Requirements for Design and Engineering Assistance	Information required from design/engineering only applicants as part of a full application after the proposal has been approved.	Section N
ED-900E - Calculation of Estimated Relocation and Acquisition Expenses	Provides detailed breakdown of the estimated total for line item 3 ("relocation expenses and payments") of Form SF-424C, 'Budget Information - Construction Programs to comply with the Uniform	Exhibit E

Proposed New Form	Content of the Form	Relevant Sections of the Existing ED-900
	Relocation Act.	
ED-900F - Supplement for Revolving Loan Fund Applications	Information required to evaluate the competitiveness of a revolving loan fund application.	Section L
ED-900P - Proposal for EDA Assistance	New general questions to allow applicants to give a broad overview of their proposed project/scope of work.	For all applicants, new questions not contained in the ED-900. For construction applicants only, portions of section M not covered in the ED-900C Construction Form.
Environmental Narrative and Applicant Certification Clause	Template to guide the applicant through the development of an environmental narrative that satisfies the requirements of the National Environmental Policy Act (NEPA).	Referenced in section M.8, with separate documents posted on EDA's website.

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.