# SUPPORTING STATEMENT Economic Development Administration Data Collection for EDA's Compliance with Government Performance and Results Act of 1993 OMB CONTROL NO. 0610-0098

#### A. JUSTIFICATION

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

The Economic Development Administration (EDA) helps 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 jobs through world-class capacity building, planning, infrastructure, research grants, and strategic initiatives.

EDA's strategic investments in public infrastructure and local capital markets provide lasting benefits for economically disadvantaged areas. Acting as catalysts to mobilize public and private investments, EDA's investments address problems of high unemployment, low per capita income, and other forms of severe economic distress in local communities. EDA also provides special economic adjustment assistance to help communities and businesses respond to major layoffs, plant shutdowns, trade impacts, natural disasters, military facility closures, and other severe economic dislocations.

EDA must collect data and report on the performance of the following principal programs. The Public Works program promotes long-range economic development in distressed areas by providing investments for vital public infrastructure and development facilities. The Economic Adjustment program offers flexible investments for communities facing sudden or severe economic distress, including revolving loan fund grants. EDA's Planning program supports local planning and long-term partnerships with State, planning organizations, District organizations and Indian Tribes that assist distressed communities with strategic planning and investment activities. The University Center program is a partnership that draws on the expertise of local colleges and universities to help strengthen distressed communities as they strive to become economically self-sufficient. The Trade Adjustment Assistance for Firms (TAA) program, authorized under the Trade Act of 1974, assists U.S. firms and industries which have lost domestic sales and experienced unemployment due to increased imports of similar or competitive goods, become more competitive in the global economy.

The Government Performance and Results Act of 1993 (GPRA) (Pub. L. 103–62) and the GPRA Modernization Act of 2010 (Pub. L. 111–352) require Federal agencies to develop performance

measures and report agency performance results to Congress and their stakeholders. To comply with that law, EDA must collect specific data from grant recipients to report on its performance in meeting its stated goals and GPRA statutory objectives. The Congressionally mandated reports are the Performance & Accountability Report and annual Budgets. Performance measures are designed to evaluate overall program performance and not the performance of individual grantees. The information collected at project completion and various stages thereafter will be used to enhance the management and performance of EDA programs.

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 will be used by EDA personnel, stakeholders, and Congress to evaluate the agency's performance. In compliance with the GPRA, the performance measures and results are published in required reports such as the Performance & Accountability Report and annual budgets. The information will be used by EDA management to enhance the performance of its economic development assistance programs.

3. <u>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</u>.

EDA currently utilizes electronic forms (fillable PDFs) to collect data as part of its GPRA data collection process. Electronic forms are provided to recipients; however, EDA also provides hard-copy forms to recipients in cases where submitting information via electronic forms is not feasible. EDA continues to explore ways to streamline data collection and reporting process to reduce administrative burden on recipients and staff.

#### 4. Describe efforts to identify duplication.

EDA reviews existing data collection to ensure that there is no duplication. The information requested is unique to EDA program performance goals and measures, and is not collected elsewhere.

5. <u>If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.</u>

There is no significant impact on small businesses or other small entities.

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 could not fulfill its statutory mandate. Due to reductions in staffing and budgetary constraints, EDA must rely on data collection in lieu of individual project site visits.

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 an information collection to be conducted with any of the terms specified above.

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 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.

EDA solicited feedback on the proposed extension of its current GPRA forms via the Federal Register. A copy of the 60-day PRA Federal Register notice that was published on May 17, 2017, is attached. No public comments were received. Additionally, EDA consulted with its six Regional Offices to discuss the proposed extension to the Agency's current GPRA forms.

As a part of this renewal process, EDA plans to make minor clarifying edits to some of the questions on the Form ED-916, ED-917, and ED-918 and to the instruction sections of the ED-915, ED-916, and ED-917. None of these minor edits are expected to increase the time burden on the respondent nor do the modifications change the type or amount of collected information.

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

No gift or payment is 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>.

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. <u>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.</u>

There are no questions of sensitive nature.

#### 12. Provide an estimate in hours of the burden of the collection of information.

Burden requirements for the various performance reporting forms are analyzed separately.

Public Works, and Economic Adjustment Infrastructure and Revolving Loan Fund Investment Reporting Form: The estimated cost to a respondent is \$410, based on an average labor cost of \$42/hour times 8 Hrs equals \$336.00, plus \$74.00/response for non-labor costs, which includes equipment, printing, postage, and overhead, equals \$410.

950 responses @ \$42	\$42/Hr x 8 Hrs=\$336/response		=\$3	19,200 per year		
	laboı					
950 responses @		<u>\$ 74/</u>	response	= <u>\$ 70,300</u>		
non-labor costs						
	\$410		\$389,500	total		
950 responses @ 8 hour	rs/response =	7,600 burder	n hours			

Economic Development District and Indian Tribe Reporting Form: The estimated cost to a respondent is \$326, based on an average labor cost of \$42/hour times 6 hours equals \$252, plus \$74/response for non-labor costs, which includes equipment, printing, postage, and overhead, equals \$326.

518 responses @	\$42/Hr x 6 Hrs=\$252/response		=\$130,536
	labor cost per year		
518 responses @	<u>\$ 74/</u> response	= <u>\$ 38,332</u>	non-labor costs
	\$326	\$168,868	total
518 responses @ 6 hours/response	= 3,108 burde	en hours	

University Center Reporting Form: The estimated cost to a respondent is \$368, based on an average labor cost of \$42/hour times 7 hours per response equals \$294, plus \$74/response for non-labor costs, which includes equipment, printing, postage, and overhead, equals \$368.

51 responses @	\$42/Hr x 7 Hrs=\$294/response	=\$ 14,994
	labor costs per yr	
51 responses @	<u>\$ 74</u> /response	= <u>\$ 3,774</u>
	non-labor costs	

\$368 \$18,768 total

51 responses @ 7 hours/response = 357 burden hours

Trade Adjustment Assistance Reporting Form: The estimated cost to a respondent is \$326 based on an average labor cost of \$42/hour times 6 hours per response equals \$252, plus \$74/response for non-labor costs, which includes equipment, printing, postage, and overhead, equals \$326.

11 responses @ \$42/Hr x 6 Hrs=\$252/response =\$2,772 non-

labor costs

11 responses @  $\frac{\$ 74}{\text{response}} = \frac{\$ 814}{\text{non-labor}}$ 

costs

\$3,586 total

11 responses @ 6 hours/response = 66 burden hours

The collection of information does not include any cost burden other than shown in item.

# 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 #12 above).

There are no known special equipment or maintenance costs that can be or have been shown to be directly associated with the burden related to this collection of information. Most respondents have established reporting relationships with the agency.

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

The estimate annual cost to the Federal government is \$413,100 based on 1,530 responses. The estimate is based on 6 hours per response of professional and support time at \$45.00 per hour, including the cost of equipment, printing and overhead.

### 15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB 83-I.

There are no adjustments in items 13 or 14.

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

In compliance with the GPRA, the collected information will be published in aggregate form in

the following publications: Performance & Accountability Report and annual budgets. Data will not be published by individual project.

# 17. <u>If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.</u>

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 identified in Item 19 of the OMB 83-I.

There are no exceptions to the certification statements identified in item 19.

#### B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

EDA does not employ statistical methods to collect data using these forms.