

**SUPPORTING STATEMENT**  
**U.S. Department of Commerce**  
**Economic Development Administration**  
**COMPREHENSIVE ECONOMIC DEVELOPMENT STRATEGIES (CEDs)**  
**OMB CONTROL NO. 0610-0093**

**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 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 accomplishes this mission by helping states, regions, and communities through capacity building, planning, infrastructure, research grants, and strategic initiatives. Further information on EDA's program and grant opportunities can be found at [www.eda.gov](http://www.eda.gov).

In order to effectively administer and monitor its economic development assistance programs, EDA collects certain information from applications for, and recipients of, EDA investment assistance. The collection of this information is required to ensure the recipient is complying with EDA's CEDs requirements. A CEDs is required for an eligible applicant to qualify for EDA investment assistance under the agency's Public Works, Economic Adjustment, and certain planning programs (see 13 CFR 305.2 and 307.2), and is a prerequisite for a region's designation by EDA as an Economic Development District (see 13 CFR part 303). This information collection is scheduled to expire on September 30, 2018.

A CEDS also is a prerequisite for a region's designation by EDA as an Economic Development District (EDD) (see 13 CFR part 303). In addition, CEDS requirements pertain to existing recipients, as follows:

- EDA-funded EDDs must submit an updated CEDS at least once every five years.
- EDA-funded EDDs must submit an annual CEDS performance report analyzing their performance in relation to the performance targets set forth in their EDA-approved CEDS.

A CEDS emerges from a continuing planning process developed and driven by a public sector planning organization by engaging a broad based and diverse set of stakeholders to address the economic problems and potential of a region. The CEDS should include information about how and to what extent stakeholder input and support was solicited. Information on how the planning organization collaborated with its diverse set of stakeholders (including the public sector, private interests, non-profits, educational institutions, and community organizations) in the development of the CEDS should be included. In accordance with the regulations governing the CEDS (see 13 CFR 303.7), a CEDS must contain a summary background, a SWOT Analysis, Strategic Direction/Action Plan, and an Evaluation Framework. In addition, the CEDS must incorporate the concept of economic resilience (i.e., the ability to avoid, withstand, and recover from economic shifts, natural disasters, etc.).

Economic development planning – as implemented through the CEDS – is not only a cornerstone of EDA's programs, but successfully serves as a means to engage community leaders, leverage the involvement of the private sector, and establish a strategic blueprint for regional

collaboration. The CEDS provides the capacity-building foundation by which the public sector, working in conjunction with other economic actors (individuals, firms, industries), creates the environment for regional economic prosperity.

A CEDS is a strategy-driven plan for regional economic development. A CEDS is the result of a regionally-owned planning process designed to build capacity and guide the economic prosperity and resiliency of an area or region. It is a key component in establishing and maintaining a robust economic ecosystem by helping to build regional capacity (through hard and soft infrastructure) that contributes to individual, firm, and community success. The CEDS provides a vehicle for individuals, organizations, local governments, institutes of learning, and private industry to engage in a meaningful conversation and debate about what capacity building efforts would best serve economic development in the region. The CEDS should take into account and, where appropriate, integrate or leverage other regional planning efforts, including the use of other available federal funds, private sector resources, and state support which can advance a region's CEDS goals and objectives.

The following is a brief synopsis of the EDA programs affected by these requirements:

### **Public Works and Economic Development**

Public Works and Economic Development Program investments help 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 vibrant economic ecosystems, regional competitiveness and innovation.

### **Economic Adjustment Assistance**

The Economic Adjustment Assistance Program provides a wide range of technical, planning and infrastructure assistance in regions experiencing adverse economic changes that may occur suddenly or over time. This program is designed to respond flexibly to pressing economic recovery issues and is well suited to help address challenges faced by U.S. regions and communities.

### **Planning**

The Planning Program helps support planning organizations, including District Organizations and Indian Tribes, in the development, implementation, revision or replacement of 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.

If the CEDS is completed by an EDA-funded recipient, the CEDS will be structured as an actual deliverable in the grant award, and the EDA staff member administering the grant will either approve the deliverable or request changes. Alternatively, a CEDS may be required as part of an application package submitted by a non-EDA-funded District. If the CEDS is submitted with all initial application materials, it will be reviewed by the applicable EDA regional office's Investment Review Committee (IRC), and will be one of many things the IRC will consider in making a funding recommendation to the Selecting Official. In other cases, the applicant may elect to submit the CEDS after being notified by EDA that the project merits further consideration in which case the CEDS will be reviewed by EDA staff to ensure conformance with EDA requirements prior to EDA making an offer of financial assistance.

**2. Indicate how, by whom, and for what purpose the information is to 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 the CEDS is used to ensure that the recipient is complying with EDA's CEDS requirements. Specifically, a CEDS is a prerequisite for designation by EDA as an Economic Development District (EDD) under its Planning Program. The information contained in the CEDS is also evaluated by EDA personnel to competitively select proposed Public Works and Economic Adjustment Assistance projects for funding.

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 permits recipients and applicants to submit CEDS either electronically or 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. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.**

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

**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.

**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.**

On May 4, 2018, a Federal Register Notice (Volume 83, Number 87, Pages 19682 - 19683) 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 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.

**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.**

There are four components to the estimate of the burden of this information collection:

- 1) The burden on recipients newly designated as EDA-funded EDDs. These recipients must develop a CEDS acceptable to EDA as part of the scope of work of the grant. In recent years, EDA has designated an average of 3 new EDDs each year.
- 2) The burden on existing recipients, who must submit an updated CEDS at least once every five years. This involves updating the document to reflect changing economic conditions, but requires significantly less time than developing a CEDS from scratch. EDA currently has approximately 385 EDA-funded EDDs and therefore estimates that, on average, it will receive 77 revised CEDS ( $385/5=77$ ) per year.
- 3) The burden on existing recipients, all of whom must submit an annual performance report analyzing their performance relative to the targets set forth in the EDA-approved CEDS.
- 4) The burden on applicants for EDA assistance that are not located within an EDA-funded EDD. Most of the country is covered by EDA-funded EDDs; however, some areas are without an EDD. In that case, an applicant for EDA Public Works or Economic Adjustment Assistance would have to submit a CEDS as part of the application process. EDA estimates that approximately 62 applicants for Public Works or Economic Adjustment Assistance each year are not located in areas that already have EDA-approved CEDS and therefore must develop one as a prerequisite for applying for EDA assistance. EDA does not require that these CEDS, however, be as detailed as those that are developed as part of the scope of work of an EDA grant, and therefore they are not as time-consuming.

The detailed calculation is as follows:

Type of Response	Number of	Hours per Response	Total Estimated
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	<b>Responses</b>		<b>Time</b>
Initial CEDS	3	480 hours/initial CEDS	1,440 hours
Revised CEDS	77	160 hours/revised CEDS	12,320 hours
CEDS Updates/Performance Reports	385	40 hours/report	15,400 hours
CEDS by applicants not in EDA-funded District	62	40 hours	2,480 hours
		Total	31,640 hours

**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).**

Excluding the value of the burden hours, there is no cost to the respondent associated with this information collection.

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

To estimate the annual cost to the Federal government with respect to this information collection we must first calculate the hourly burden on the Federal government:

<b>Type of Response</b>	<b>Number of Responses</b>	<b>Review Hours per Response</b>	<b>Total Estimated Time</b>
Initial CEDS	3	40 hours/initial CEDS	120 hours
Revised CEDS	77	10 hours/revised CEDS	770 hours
CEDS Updates/Performance Reports	385	5 hours/report	1,925 hours
		Total	2,815 hours



Above and beyond the burden associated with EDA's application for grant assistance (included in a separate information collection), there is no burden to government personnel associated with the approximately 62 CEDS included as part of an application package from applicants located in areas not covered by EDA-funded EDDs.

The annualized cost to the Federal Government is therefore estimated as:

$$2,815 \text{ hours} * \$67/\text{hour} = \$188,605.00$$

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

Not applicable. There were no changes or adjustments.

**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 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; there is no form or document which EDA uses on which to place such a display because the guidance is provided in EDA's regulations at section 302 of the Public Works and Economic Development Act of 1965 (42 U.S.C. § 3162) and EDA's regulations at 13 C.F.R. part 303.

**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. EDA is not aware of any statistical sampling methods that might reduce burden or improve the accuracy of results.