

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

A. JUSTIFICATION

This request is for Office of Management and Budget approval to revise and extend 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.

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 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.

EDA collects application information through a series of ED-900 forms:

- ED-900 – General Application for EDA Programs;

- ED-900 B – Beneficiary Information Form
- ED-900A – Additional EDA Assurances for Construction or Non-Construction Investments;
- ED-900C – EDA Application Supplement for Construction Programs;
- ED-900D – Requirements for Design and Engineering Assistance;
- ED-900E – Calculation of Estimated Relocation and Land Acquisition Expenses;
- ED-900F – Supplement for Revolving Loan Fund Applications;
- ED-900P – Proposal for EDA Assistance.

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), Section 27 of the Stevenson-Wydler Act, EDA’s accompanying regulations codified in 13 C.F.R. Chapter III, and the applicable Notice of Funding Opportunity (NOFO).

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. EDA is working with grants.gov staff to ensure the new forms are posted on www.grants.gov and can be completed and submitted via the Internet.

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.

On May 4, 2018, a Federal Register Notice (Volume 83, Number 87, Pages 19687 - 19689) 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.

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) and Grants Online 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	2150.4
Proposal Submission for Construction Applicants	263	4.2	1104.6
Full Application Submission for Construction Applicants	99	43.0	4257
Full Application Submission All Other EDA Programs	737	17.1	12602.7
Full Application Submission for Non-Profit Applicants	125	19.5	2437.5
TOTAL	1672		22,552.2
Average Applicant Burden			13.48

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).

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.

The estimated total annualized costs to the Federal government for these information collections are approximately **\$4,256,912** (based on an average of 38 hours of professional and support time at \$67 per hour; 1672 responses @ \$2,546 each).

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

Detailed Information About Proposed Changes

Form	Section	Proposed Changes
All	Where applicable	Replace all occurrences of “FFO” or “Federal Funding Opportunity” with “NOFO” or “Notice of Funding Opportunity” as appropriate, per Department of Commerce grants policy
ED-900 - General Application for EDA Programs	A. Applicant Information	None
ED-900	B. Project Information	<p>1) To increase clarity, revise Question B.1. to read: “Provide a geographical definition of the region to be served by the investment (project), including the specific geographic location of the project within the region.”</p> <p>2) To increase clarity, revise Question B.2. to read: “Describe and outline the scope of work for the proposed EDA investment, including a list of tasks to be undertaken.”</p> <p>3) For consistency, add “N/A – Not Applicable” to the available options under “No” within Question B.3.</p> <p>4) To increase clarity, revise Question B.3.b. to read: “Describe the economic conditions of your region. Define the economic development need to be addressed by the proposed EDA investment and explain how the</p>

Form	Section	Proposed Changes
		proposed investment will address that need.”
ED-900	C. Regional Eligibility	<p>1) Reverse the order of C.2. and C.3. so that the basis of eligibility is asked about prior to the source of data.</p> <p>2) Question C.3. (as renumbered): Add a new box C.3.b. and renumber the rest accordingly. The new box reads: “C.3.b. The most recent Bureau of Labor Statistics Data.” This change will reflect the hierarchy of sources set out in 13 C.F.R. 301.3(a)(4).</p>
ED-900	E. Administrative Requirements	Provide clarification in Question E.1.b. by adding “as listed in question B.9.” in parenthesis after “other parties” and add “under 13 C.F.R. § 302.20” after “civil rights requirements”.
ED-900	Instructions	<p>1) To avoid duplication, revise the instructions for B.2. to delete “..., and key milestones and an associated schedule for when the project could start, when key milestones could be achieved, and when the project is anticipated to be completed”. Milestones and schedule should not be included for this question. They should be included in the response to B.7.</p> <p>2) To provide additional clarity on what EDA may require, revise the instructions for D.2. to include a third sentence: “Alternatively, applicants must provide supplemental documentation such as: a certificate of indirect costs and acknowledgment letter from the cognizant agency, a cost allocation plan, an indirect cost rate proposal and/or other acceptable documents under Uniform Administrative Requirements, Cost Principles, and Audit Requirements for</p>

Form	Section	Proposed Changes
		Federal Awards (Uniform Guidance) as set forth in 2 C.F.R. part 200 or relevant procurement regulations.”
ED-900B - Beneficiary Information Form	D. Assurances by Beneficiary that is an “Other Party”	To increase clarity, revise the first sentence of the third paragraph to read: “By submitting these assurances, the Other Party certifies that it will comply with the following requirements:”
ED-900C - EDA Application Supplement for Construction Programs	D. Title Requirements	<p>To provide additional clarity on what EDA may require, revise Question D.2. to read: “EDA regulations normally require recipients to provide a security interest and/or covenant of use in the real property or significant items of tangible personal property acquired or improved with EDA investment assistance (see 13 C.F.R. §§ 314.8 & 314.9). Will you be able to provide the required security interest?”</p> <p>Additionally, after the “No” box in D.2.: revise the parenthetical to say “(explain how you will satisfy the requirements of 13 C.F.R. §§ 314.8 & 314.9).”</p>
ED-900C	E. Sale or Lease	<p>To increase clarity, revise Question E.3. to read: “Is the purpose of the project to construct facilities to serve a privately owned industrial or commercial party or other privately owned sites for sale or lease?”</p> <p>Also in Question E.3. and to provide additional clarity on what EDA may require, revise the second sentence after the No/Yes checkboxes to read: “Note that EDA may require that the private owner agree to certain restrictions on the use of the property and may require that those restrictions survive any sale or transfer of the property.”</p>

Form	Section	Proposed Changes
		Finally, in Question E.3. and to provide additional clarity on what EDA may require, revise the third sentence after the No/Yes checkboxes to read: “In addition, EDA may require evidence that the private party has title to the park or site and may require the private party to provide other assurance that EDA determines are necessary to ensure that the property is used in a manner consistent with the project purpose.”

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.