

**SUPPORTING STATEMENT
U.S. Department of Commerce
Economic Development Administration**

**Title: Semi-Annual and Annual Data Collection Instruments for Economic Development Administration Grant and Cooperative Agreement Award Recipients
Form Names and Numbers: ED-915, ED-916, ED-917, ED-918
OMB Control Number: 0610-0098**

A. JUSTIFICATION

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

Guided by the basic principle that sustainable economic development should be locally-driven, EDA works directly with communities and regions to help them build capacity for economic development based on local business conditions and needs. The Public Works and Economic Development Act of 1965 (PWEDA) (42 U.S.C. 3121 et seq.) is EDA's organic authority. Under PWEDA, EDA provides financial assistance to both rural and urban distressed communities by fostering entrepreneurship, innovation and productivity through investments in infrastructure development, capacity building and business development in order to attract private capital investments and new and better jobs to regions experiencing substantial and persistent economic distress.

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. EDA collects and reports on performance measures in compliance with Government Performance and Results Act of 1993 (P. L. 103-62) that, as amended by the GPRA Modernization Act of 2010 (P. L. 111-352), establishes requirements for all agencies to collect, analyze, and report on their performance.

EDA's performance goals and specific performance and outcome metrics are tied to the U.S. Department of Commerce's performance management structure. The performance data are analyzed for economic and program trends and used to enhance EDA's program performance. The data are reported via departmental publications and reviewed by key stakeholders, such as the Office of Management and Budget (OMB), the Government Accountability Office (GAO), and Congress. EDA's performance targets are tied to its annual budget request and appropriations. DOC and relevant stakeholders consider EDA's performance results when EDA submits its annual budget request. EDA's Annual Performance Plan (APP) identifies anticipated outcomes based on the investment of appropriated funds by program and by performance measure.

EDA's diverse portfolio of programs, the changing economy, and advances in the field of program evaluation make updates to EDA's methods for performance measurement

and program evaluation necessary in order to ensure transparency, accountability, and effectiveness of EDA investments. The recently passed Foundations for Evidence-Based Policymaking Act of 2018 (P. L. 115–435) further emphasizes the importance of updating existing methodologies for performance measurement and program evaluation to align with evolving best practices.

Since 2011, EDA has partnered with leading research institutions (UNC-Chapel Hill, George Washington University, and SRI International) to develop an innovative performance measurement and program evaluation system focused on EDA’s non-infrastructure economic development assistance.

The proposed system aims to capture and measure linkages between economic development grant-sponsored activities, their short-term impacts on economic development capacities, and the resulting long-term desired economic outcomes at the regional level.

The system mandates collection and aggregation of four sets of data at the program and at the regional level in order to compile: baseline information, program outputs metrics, capacity outcomes metrics, and the realized outcomes metrics.

EDA will approach the implementation in the following ways:

1. The baseline information will be collected automatically through publicly available, and where necessary third party, baseline conditions data on a regional level. These data will help consider how initial conditions, such as per capita income or employment levels in a region, affect grantee organizations and the outcomes they accomplish.
2. The data on program activities will be collected directly from the grantees through online data collection instruments on a semi-annual basis in order to monitor and assess grantees’ progress, as well as to compile the data for future explorations of the linkages between program activities and capacity building outcomes. Examples of grant-sponsored program activities to be tracked are: number of networking events held, amount of financial support secured (e.g., obtaining angel/seed/venture capital/loan funding), and number of training/skills assistance sessions held.
3. Information on the capacity and select traditional performance outcomes, such as job creation, will be collected directly from the grantees through online data collection instruments on an annual basis. The directly-collected dataset will be analyzed alongside publicly-available and, if necessary, additional third-party regional indicators. The data will reflect short-term, direct impacts that result from the activities and services provided as a result of a grant and will be used to evaluate the effects of such activities on building of select capacities. The examples of capacities include the number of new professional and business relationships formed, number of new export strategies developed, and number of patents obtained, as a result of the program activities sponsored under the grant.

4. Finally, the system requires compilation of data on outcomes that encapsulate the traditional long-term economic goals such as per capita income growth and job and company creation at the regional level. Similar to the baseline data collection, EDA will gather publicly available data from sources such as the Bureau of Labor Statistics, U.S. Census Bureau, and Bureau of Economic Analysis. The capacity outcomes data will be tested against the long-term realized outcomes data as part of this new program evaluation studies.

This supporting statement for the information collection request pertains to the data collection needs described in paragraphs #2 and #3.

To accomplish these goals, EDA proposes revising Forms ED-916, ED-917, and ED-918, which are currently used to collect limited performance information on sponsored activities and resulting outcomes from the grantees receiving assistance under just three of EDA's non-infrastructure programs: Partnership Planning, University Center, and the Trade and Adjustment Assistance for Firms, respectively. The revised Forms ED-916, ED-917, and ED-918 would instead comprehensively cover all of EDA's non-infrastructure programs: Economic Adjustment Assistance (non-infrastructure projects), including new Revolving Loan Funds; Planning, including Partnership Planning; Local Technical Assistance, including University Centers; Build to Scale (formerly Regional Innovation Strategies); Research and National Technical Assistance; and Trade Adjustment Assistance for Firms. The data on program-sponsored activities and associated outcomes will be collected on semi-annual and annual bases, respectively.

EDA does not propose to revise the remaining fourth form under this information collection, Form ED-915, which is used to collect performance information on infrastructure and existing revolving loan fund (RLF) projects funded through awards from EDA's Public works and Economic Adjustment Assistance programs. Form ED-915 would instead be extended without change; however, EDA plans to revise Form ED-915 in the future to update the information collected on infrastructure projects. Note that all RLF awards made after the implementation of the revised Forms ED-916, ED-917, and ED-918 will be required to report performance information using those Forms; this requirement may be extended to all RLF awards when Form ED-915 is revised.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The information collected through the revised collection instruments will be used by EDA personnel to monitor recipients' compliance with EDA's statutory and regulatory requirements and specific terms and conditions relating to individual awards, as well as for performance measurement and program evaluation analyses to ensure effectiveness of EDA's programs. The information collected will not be disseminated to the public, except at the aggregated level in studies and reports.

Specifically, the revised Forms ED-916, ED-917, and ED-918 will gather information from the grantees of the following programs: Economic Adjustment Assistance (non-infrastructure

projects), including new Revolving Loan Funds; Planning, including Partnership Planning; Local Technical Assistance, including University Centers; Build to Scale (formerly Regional Innovation Strategies); Research and National Technical Assistance; and Trade Adjustment Assistance for Firms. The data on program-sponsored activities and associated outcomes will be collected on semiannual and annual bases, respectively. (As discussed above, EDA proposes to extend without revision the remaining fourth form under this information collection, Form ED-915, which is used to collect information on infrastructure and existing revolving loan fund projects.)

The data collected through the revised Forms ED-916, ED-917, and ED-918 have been analyzed for internal program performance and incorporated as part of EDA's APPR. The revised collection instruments will capture the key activities identified in the course of cooperative research by SRI International UNC at Chapel Hill, GW University, and SRI International.

It is expected that only select categories of questions will apply to the activities undertaken as part of any individual grantee's project, and the respondent will be able to bypass any category of questions that is not applicable. It is also expected that not every question within any given category will apply to each project, so the respondent will also be provided with an option to check a "not applicable" radio button for many questions in all of the forms.

This flexibility will alleviate the reporting burden on the grantee, as well as provide an additional insight for the agency in order to help create a typology of activities and outcomes by program for performance measurement, as well as process evaluation analyses by EDA personnel.

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.

Collection of the information will be conducted through a web-based instrument. To test out the new system and metrics, EDA piloted the instruments via a third-party survey instrument in FY2018. EDA will work to migrate the collection process to a more sophisticated system in the near future. Under the ongoing pilot of the measures, the process is as outlined below:

- Email addresses are collected from the participants' grant application contact information.
- EDA personnel sends reminder emails to respondents with a URL to access the data collection instrument.
- Respondents access the data collection instrument via email link in the email.
- EDA personnel sends emails to respondents on a weekly basis to respondents that have not completed the data collection instrument.

In the final roll-out of the metrics, information will be collected through online data collection instruments. While the individual responses won't be disseminated to the public, aggregate information on performance, highlight data points, and results of internal and external analyses of the collected data, will be increasingly shared on [EDA's performance web page](#).

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in item 2 above.

EDA is unaware of any duplication with respect to this information collection. EDA reviews existing information collections to ensure that there is no duplication. The outcome information collected is unique to the EDA programs and is not collected elsewhere.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

This collection does not directly involve small businesses. The respondent EDA grantees are almost exclusively States and local governments, institutions of higher education, non-profit organizations, Tribal entities, and District Organizations.¹ In the cases where EDA grantees serve small businesses, such grantees might collect pertinent information based on existing arrangements with clients, borrowers, or beneficiaries.²

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing the burden.

The data collected will help EDA construct more robust performance metrics, close current data collection gaps, and increase accountability and transparency of the agency's work by providing better insight into the efficiency and effectiveness of all the programs under its non-infrastructure portfolio.

The data will be collected on semi-annual and annual bases. According to the recommendations by SRI International, to not collect the data or less frequently collect the data would result in a less robust performance measurement system that would in turn decrease the agency's ability to maximize accountability, transparency, and conduct program evaluation studies.

7. Explain any special circumstances that would cause information collection to be conducted in a manner inconsistent with OMB guidelines.

There are no special circumstances that would cause the information collection to be conducted in a manner inconsistent with OMB guidelines.

¹ Private individual or for-profit organizations may be eligible for Training, Research, and Technical Assistance grants in accordance with EDA regulations at 13 CFR 306.1(d)(3). In addition, an entity that is an institution of higher education, a public-private partnership, a science or research park, a Federal laboratory, or an economic development organization or similar entity, as well as consortiums of these or any of the other eligible recipients of EDA awards may be eligible for Build to Scale (formerly Regional Innovation Strategies) grants in accordance with 13 CFR 312.6.

² For instance, EDA grantees have reported distributing "impact surveys" to their clients, including small businesses. Much of the information collected by EDA grantees presently aligns with the planned data collection instruments.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB.

On November 12, 2019, a Federal Register Notice was published to solicit public comments on this information collection (84 FR 61009). No public comments were received.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Gifts or payments will not be provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the 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 is generally 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 questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

The proposed data collection instruments do not ask any questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection on information.

Estimated Number of Respondents:

Revised Forms ED-916, ED-917, and ED-918:

Semi-annual: 550 respondents

Annual: 550 respondents

Extended (without revision) Form ED-915: 500 respondents

Total annual number of responses: $(550 \times 3) + 500 = 2,150$ respondents

Estimated Time per Response:

Revised Forms ED-916, ED-917, and ED-918:

Semi-annual: 2.5 hours \times 2 times per year

Annual: 6 hours once per year

Extended (without revision) Form ED-915: 8 hours

Estimated Total Annual Burden Hours:

Revised Forms ED-916, ED-917, and ED-918:

Semi-annual: 2,750 burden hours per year

Annual: 3,300 burden hours per year
 Extended Form ED-915: 4,000 hours
 Total hours: **10,050 burden hours per year**

Estimated Total Annual Cost to Public: \$576,568 per year
 (cost assumes application of U.S. Bureau of Labor Statistics second quarter 2019 mean hourly wage for professional and related occupations of \$57.37).

13. Provide an estimate for the total annual cost burden to respondents or record-keepers resulting from the collection of information.

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

14. Provide estimates of annualized costs to the Federal Government.

The hourly burden on the Federal government is as follows:

Type of Response	Number of Responses	Review and Analysis Hours	Total Estimated Time
Semi-Annual	1,100	40 hours per quarter	160 hours
Annual	1,050	80 hours semiannually	160 hours
Econometric testing, and reporting	2,150	120 hours/annually	120 hours
		Total	440 hours

Beyond the labor burden of EDA's collection and analysis of the data, there is no annualized cost to the Federal Government.

The annualized cost to the Federal Government is therefore estimated as: 440 hours * \$68/hour (Grade 13, step 4) = **\$29,920**

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.

This revised information collection will not involve program changes or adjustments.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and

ending dates of the collection of information, completion of report, publication dates, and other actions.

Aggregated data on program outputs and capacity outcomes will be tabulated and published annually on EDA's [performance page](#). As more data become available, EDA expects to publish findings from internal analyses and studies (e.g., process evaluation, impact evaluation). EDA may also provide aggregated or suppressed (for privacy) data to third party evaluators for independent assessments.

It is also expected that EDA will incorporate findings into constructing new targets for performance in order to continually assess the effectiveness of its non-infrastructure investments.

17. If you are seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The information collection is not seeking to claim this exemption; it will display the expiration date for OMB approval.

18. Explain each exception to the topics of the certification statement identified in Certification for Paperwork Reduction Act Submissions.

No exceptions are requested.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

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