

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

**A. JUSTIFICATION**

This Supporting Statement is for the revision and extension of a currently approved information collection.

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

The Economic Development Administration (EDA) leads the Federal economic development agenda by promoting innovation and competitiveness, preparing American regions for growth and success in the worldwide economy. Guided by the basic principle that sustainable economic development should be locally-driven, EDA works directly with communities and regions to help them build the 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 and is the primary legal authority under which EDA awards financial assistance. 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 economic distress.

EDA must collect specific information from applicants for EDA investment assistance to evaluate whether proposed projects satisfy eligibility and programmatic requirements contained in PWEDA and other authorizing statutes, EDA regulations at 13 C.F.R. Chapter III, and applicable Notices of Funding Opportunity.

EDA proposes to revise and extend the following forms under this information collection:

- ED-900 – General Application for EDA Programs
- ED-900B – Beneficiary Information Form
- 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 – Additional EDA Assurances for Revolving Loan Fund Investments

EDA does not propose to extend two existing forms under this information collection:

- ED-900A – Additional EDA Assurances for Construction Or Non-Construction Investments
- ED-900P – Proposal for EDA Assistance

Form ED-900A is no longer necessary because the assurances collected in Form ED-900A are redundant with other materials, including other forms under this information collection and certifications collected by SAM.gov. Form ED-900P is no longer necessary because EDA has eliminated the requirement for a financial assistance applicant to submit a proposal prior to submitting a full application. By eliminating Forms ED-900A and ED-900P, EDA will reduce the estimated time per response to this information collection.

**2. Indicate how, by whom, and for what purpose the information is to be used.**

The information contained in this information collection is used by EDA to evaluate and competitively select projects for financial assistance awards. The information is also used by EDA to create the terms and conditions of financial assistance awards, including scopes of work and budgets for financial assistance awards.

**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 grants.gov. EDA will work with grants.gov staff to ensure the updated information collection is posted on www.grants.gov and can be completed and submitted via grants.gov.

**4. Describe efforts to identify duplication.**

EDA reviews existing information collections to ensure that there is no duplication. The information requested is unique to the information collection and is not collected elsewhere.

**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 and other authorizing statutes (e.g. the Trade Act of 1974, Stevenson-Wydler Technology Innovation Act of 1980) and EDA 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 to award financial assistance 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.**

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

**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 27, 2021, EDA published a Federal Register notice (FRN) that solicited public comments on this information collection (86 FR 28538). In particular, EDA solicited views from persons outside the agency on topics including but not limited to: (a) whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility; (b) the accuracy of the agency's estimate of the burden (including hours and cost) of the proposed collection of information; (c) ways to enhance the quality, utility, and clarity of the information to be collected; and (d) ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology. No public comments were received in response to the FRN that solicited public comments on this information collection.

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

No gifts or payments are made to any respondent, other than disbursements of award funds to financial assistance recipients.

**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 estimates of the hour burden of the collection of information.**

<b>Application Type</b>	<b>Estimated Number of Responses</b>	<b>Average Time Estimate</b>	<b>Total Hours</b>
Full Application Submission for Construction Applicants	977	43.0	42,011
Full Application Submission All Other EDA Programs	1,663	17.1	28,437
<b>TOTAL</b>	<b>2,640</b>		<b>70,448</b>

Multiplying the expected number of responses for construction and non-construction projects by the average time to complete a response for construction and non-construction projects, EDA estimates the above total respondent burden.

EDA estimates that an increase in the number of respondents to this information collection will outweigh the reduced time per response for this information collection and result in an increase in estimated burden hours for this information collection over the previous OMB approval of this information collection. The recently enacted American Rescue Plan Act of 2021 (Pub. L. 117-2) appropriated \$3,000,000,000 in supplemental funds to EDA to “prevent, prepare for, and respond to coronavirus and for necessary expenses for responding to economic injury as a result of coronavirus.” This supplemental funding will substantially increase the number of respondents applying for EDA financial assistance and therefore required to complete the information collection. Although the proposed revision and extension of the information collection will reduce the estimated amount of time required to complete the information collection, the substantially increased number of respondents to this information collection will result in an increase in burden hours for this information collection.

**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).**

Apart from the value of the burden hours, there is no additional cost to respondents associated with this information collection.

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

EDA estimates the total annual cost burden to the federal government to be \$7,151,813 (38 hours to review each response multiplied by 2,640 responses multiplied by \$71.29 per hour). The hourly wage used is that of a federal employee at grade 13, step 4, plus 30% to account for overhead and other costs (\$54.84 per hour + \$16.45 per hour).

Apart from the value of the burden hours, there is no additional cost to the federal government associated with this information collection.

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

EDA proposes to make clarifying edits to the following forms under this information collection: Forms ED-900 GA, ED-900B, ED-900C, ED-900D, ED-900E, and ED-900F. The clarifying edits do not change the type or amount of information collected, and the clarifying edits will not impact the time burden for respondents to complete this information collection. The clarifying edits include:

1. Re-ordering many of the questions in Form ED-900 GA to improve clarity and to assist applicants in completing the form in a way that can be easily evaluated by EDA.
2. Adding new questions to Form ED-900 GA to gather improved project location and other information necessary for EDA to comply with new data and reporting requirements.
3. Removing duplicative questions across the forms under this information collection.
4. Modifying Form ED-900F to only collect assurances, removing questions regarding the proposed operation of a revolving loan fund, thus greatly simplifying the form for applicants.
5. Moving form instructions from the end of each form to accompany various questions throughout each form to improve the applicant experience.

As discussed in the response to question #1, EDA does not propose to extend two existing forms under this information collection: Forms ED-900A (Additional EDA Assurances for Construction Or Non-Construction Investments) and ED-900P (Proposal for EDA Assistance). Form ED-900A is no longer necessary because the assurances collected in Form ED-900A are redundant with other materials, including other forms under this information collection and certifications collected by SAM.gov. Form ED-900P is no longer necessary because EDA has removed the requirement for a financial assistance applicant to submit a proposal prior to submitting a full application. By eliminating Forms ED-900A and ED-900P, EDA will reduce the estimated time per response to this information collection.

**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, with limited exceptions, including for EDA press releases announcing EDA financial assistance awards.

Information collected from respondents will generally only be published in aggregate form as part of EDA's annual report, GPRA reporting, EDA's Balanced Scorecard, progress reports to the DOC and/or its OIG, 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.**

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.**

There are no exceptions to the certification statement.

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

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