

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

A. JUSTIFICATION

This Supporting Statement is for the extension without change 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.

To effectively administer and monitor its economic development assistance programs, EDA collects certain information from applications for, and recipients of, EDA investment assistance. A Comprehensive Economic Development Strategy (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 13 CFR 303.7(b), a CEDS must contain a summary background, a SWOT (Strengths, Weaknesses, Opportunities, and Threats) 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.). A CEDS is required for an eligible applicant to qualify for an EDA investment assistance under EDA's Public Works program, Economic Adjustment Assistance program, and certain planning programs, and is a prerequisite for a region's designation by EDA as an Economic Development District (see 13 CFR part 303, 13 CFR 305.2, and 13 CFR 307.2). EDA collects information under this information collection to ensure compliance with EDA's CEDS requirements.

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

The information contained in the CEDS is used by EDA personnel to ensure that recipients of planning financial assistance awards are 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 applicants and recipients of financial assistance awards to submit CEDS either electronically or in hardcopy. EDA is not proposing any changes to the current information collection request.

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 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 implement certain financial assistance programs if the information collection is not conducted. As described above, a CEDS is required for an eligible applicant to qualify for an EDA investment assistance under EDA's Public Works program, Economic Adjustment Assistance program, and certain planning programs, and is a prerequisite for a region's designation by EDA as an Economic Development District (see 13 CFR part 303, 13 CFR 305.2, and 13 CFR 307.2).

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 October 12, 2021, EDA published a Federal Register notice (FRN) that solicited public comments on this information collection (86 FR 56687). 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.

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

- 1) The burden on recipients of planning financial assistance awards that are newly designated as EDA-funded EDDs. These recipients must develop a CEDS acceptable to EDA as part of the scope of work of a planning award.
- 2) The burden on existing planning award 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.
- 3) The burden on existing planning award 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 financial assistance awards that are not located within an EDA-funded EDD. Most of the U.S. 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 planning award, and therefore they are not as time-consuming.

Type of Response	Number of Respondents	Average Hours	Total Estimated
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		per Response	Burden Hours
Initial CEDS	3	480 hours	1,440 hours
Revised CEDS	77	160 hours	12,320 hours
CEDS Updates/Performance Reports	385	40 hours	15,400 hours
CEDS by applicants not in EDA-funded District	62	40 hours	2,480 hours
Total	527 respondents		31,640 hours

Multiplying the expected number of responses by the average time to complete a response, EDA estimates the above total respondent 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).

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.

The estimated annual hourly burden on the Federal government with respect to this information collection is as follows:

Type of Response	Number of Respondents	Average Review Hours per Response	Total Estimated Hours
Initial CEDS	3	40 hours	120 hours
Revised CEDS	77	10 hours	770 hours
CEDS Updates/Performance Reports	385	5 hours	1,925 hours
Total	485 respondents		2,815 hours

EDA estimates the total annual cost burden to the federal government to be \$200,681 (2,815 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 extend this information collection without change.

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, information collected from respondents may 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 for this information collection.