

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. EDA's organic authority, the Public Works and Economic Development Act of 1965 (PWEDA) (42 U.S.C. 3121 et seq.), enables EDA to provide 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.

The Foundations for Evidence-Based Policymaking Act of 2018 (P. L. 115-435) emphasizes the importance of updating existing methodologies for performance measurement and program

evaluation to align with evolving best practices. In 2020, EDA received OMB approval for revised forms ED-916, ED-917, ED-918, which cover all EDA's non-infrastructure programs except for the Build Back Better Regional Challenge (BBBRC) and the Good Jobs Challenge (GJC). These forms were revised to include additional metrics with updated methodologies for performance measurement and program evaluation to align with evolving best practices, stemming from years of working with third-party research institutions like SRI International.

EDA began collecting data on the revised ED-916, ED-917 and ED-918 forms in December 2020. EDA proposes extending, without change, all its data collection forms: ED-915, ED-916, ED-917 and ED-918 to continue data collection to help EDA analyze and speak to its performance.

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 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 extended 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; Research and National Technical Assistance; and Trade Adjustment Assistance for Firms, and all American Rescue Plan Act programs, except for BBBRC and GJC. The data on program-sponsored activities and associated outcomes will be collected on a semiannual and annual basis, respectively. Form ED-915, will gather information on infrastructure and existing revolving loan fund projects.)

The data collected through the forms will be analyzed for internal program performance and incorporated as part of EDA's APPR. The 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.

Grantees will only respond to categories of questions that apply to the activities undertaken as part of their project and will be able to bypass any category of questions that is not applicable. Not every question within any given category will apply to each project, so the respondent is provided with an option to check a "not applicable" radio button for many questions in all the forms.

This flexibility is intended to alleviate the reporting burden on the grantee, as well as provide an additional insight for the agency 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.

Data collection of the information is conducted through a web-based instrument, namely Qualtrics. The current data collection process is as follows:

- Email addresses are collected from the participants' grant application contact information.
- EDA personnel sends distribution emails to respondents with a URL to access the data collection instrument.
- Respondents access the data collection instrument via link in the email.
- EDA personnel send reminder emails to respondents on a weekly basis to respondents that have not completed the data collection instrument.
- Respondents and EDA personnel receive an automated email with a PDF copy of responses upon survey submission.

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](#) starting in Q4 FY2023.

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

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.

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 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 basis. 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.

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 February 16, 2023, a Federal Register Notice was published to solicit public comments on this information collection (88 FR 10086). 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.

Data Collection Form	Estimated Number of Respondents	Estimated Time Per Response	Estimated Total Burden Hours
ED-915 (3-6-9 years)	742	1 hour	742
ED-916 (semi-annual)	1,067	1.5 (X 2)	3,201
ED-917 (annual)	416	8	3,328
ED-918 (annual)	1,285	6	7,710
Total	3,510		14,981

Estimated Total Annual Cost to Public: \$945,001 per year.

(cost assumes application of U.S. Bureau of Labor Statistics May 2022 mean hourly wage for Management occupations of \$63.08).

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	1,067	50 hours per quarter	200 hours
Annual	2443	100 hours semiannually	200 hours
Econometric testing, and reporting	3510	140 hours/annually	140 hours
		Total	540 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: 540 hours * \$55.64/hour (Grade 13, step 2) = **\$30,045**

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

In the review of this collection over the last 3 years, burden hours and cost were adjusted.

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.