

Supporting Statement

Application for Department of Defense Impact Aid for Children with Severe Disabilities

A. JUSTIFICATION

1. Need for Information Collection

The National Defense Authorization Act for Fiscal Year 2001, P.L. 106-398, Section 363, authorized the Secretary of Defense to make payments to each local educational agency (LEA) eligible to receive funding for high costs of educating qualifying military dependent children with severe disabilities. The National Defense Authorization Act for Fiscal Year 2006, Section 573, P.L. 109-163 (effective January 6, 2006), provided funding in FY 2006 for this program (Atch A). This information collection is needed to determine those qualified LEAs who are eligible to receive payment.

2. Use of Information

The purpose of this information collection is to determine eligibility and calculate payments for eligible LEAs who have high costs for educating military dependent children with severe disabilities. In order for a local education agency (LEA) to be determined eligible to receive payment for costs incurred in providing a free appropriate public education to each child described in subparagraph (A)(ii), (B), (D)(i) or (D)(ii) of section 8003(a)(1) of the Elementary and Secondary Education Act of 1956, as amended (20 U.S.C. 7703(a)(1)) (Atch B), the LEA must provide educational and related services to two or more children with severe disabilities, and satisfy certain criteria. Payments will be made by the Department of Defense (DoD) to LEAs only on behalf of each such child whose individual educational or related services cost exceed either (a) five times the national or State average per pupil expenditure (whichever is lower) for a program that is located outside of boundaries of the school district of the LEA that pays for the special education (SPED) program of the student, or (b) three times the State average per pupil expenditure for a SPED program offered by the district, or within the boundaries of the school district served by the LEA.

The Department will begin by obtaining background eligibility information from the Department of Education (ED), which ED receives from the LEAs through the Federal Impact Aid Program administered by ED. It is anticipated that ED will provide a list of approximately 410 LEAs that have qualified for Federal Impact Aid and have verified that they educate military dependent students with disabilities. The SD Form 816, "Application for Department of Defense Impact Aid for Children with Severe Disabilities" and SD Form 816C, "Continuation Page for Application for Department of Defense Impact Aid for Children with Severe Disabilities," is available electronically, and

guidelines for applying is forwarded by the Deputy Under Secretary of Defense (Military Community and Family Policy), to those LEAs identified by ED to collect the relevant data (Atch C). Of these approximately 410 LEAs, DoD estimates that about 50 will be eligible for funds for the Impact Aid for Children with Severe Disabilities program. The information from the SD Form 816 and SD Form 816C will be used by the Department to calculate the payment that each LEA is eligible to receive. The SD Form 816C is available for those LEAs who have multiple categories of special education costs and require additional payment determination sections of the SD Form 816. Once the payment is determined, the Department will forward the authorized payment amount (not the information collected) through the Department of Defense Education Activity to Defense Finance and Accounting Service (DFAS) officials to make electronic payments to the qualifying LEAs.

This information collection is based on an annual appropriation of funds. Process for the Department cannot start until funds have been appropriated and received.

This information collected from the SD Form 816 and SD Form 816C has been used to determine which LEAs are eligible for funding under the Department of Defense Impact Aid for Children with Severe Disabilities program, and to determine how much assistance each LEA should receive.

3. Improved Information Technology.

The SD Form 816 and SD Form 816C are available to the LEAs electronically on-line from the Department of Defense forms website (<http://www.dtic.mil/whs/directives/infomgt/forms/formsprogram.htm>) in both fillable ADOBE Acrobat PDF and Excel files. For respondents who have access to computerized information technology, the forms can be completed on-line before printing for signature. At this time, there is no practical or cost-effective way to completely implement the requirements of the Government Paperwork Elimination Act. It does not appear that the electronic signature is practical to use for the respondent's limited submission of the SD Form 816 and SD Form 816C. There is an ongoing initiative within the Department of Defense to enable the PDF forms, but the Department currently has limited reader extension licenses which allow the user to fill, sign, save, and send the form at no cost to the respondent. Without the reader extension the respondent would have to purchase the full ADOBE Acrobat product which would be an additional cost burden on the respondent. In the future, when the Department obtains additional licenses, these forms will be considered for applying reader extensions. Until then, each LEA can transmit the form electronically, but will be required to fax only the signature page of the form.

4. Efforts to Identify Duplication

The specific information sought by the SD Form 816 and SD Form 816C application is not available from any other source. The Department has full responsibility to review the application, determine eligibility, and disburse the funds.

5. Methods Used to Minimize Burden on Small Entities

The Collection of information does not involve small businesses or other small entities.

6. Consequences of Not Collecting the Information

This collection of information is conducted only once a year in fiscal years when the specific funds are appropriated. If the information is not collected, the Secretary of Defense will not be able to comply with the Congressional mandate, and the LEAs will not receive the appropriated funds.

7. Special Circumstances

There are no special circumstances. This collection will be conducted in a manner consistent with guidelines contained in 5 CFR 1320.5(d)(2).

8. Agency 60-Day Federal Register Notice and Consultations Outside the Agency

This information collection was published in the Federal Register on May 11, 2006, Vol. 71, No. 91, page 27468-27469 (Atch D).

Consultations regarding this collection were conducted with Mr. Kyle Fairbairn, Business Manager, Bellevue Public Schools, Bellevue, NE, and Ms. Robin Robinson, Program Operations Manager, Department of Education, and with Marsha Mouyal, Office of the DoD General Counsel. No comments were received.

9. Payments to Respondents

No payment or gifts will be made to respondents.

10. Assurance of Confidentiality

The data being collected does not involve personal information. Therefore, no assurances of confidentiality are being made.

11. Sensitive Questions

This application is not considered sensitive and it does not involve any information of a personal nature.

12. Estimates of Annual Response Burden and Labor Cost for Hour Burden to the Respondent for Collection of Information

a. *Annual Response Burden:

(1) SD Form 816 and SD 816C (combined)

| | |
|---------------------------|-----------|
| Total annual respondents: | 50 |
| Frequency of response: | 1 |
| Total annual responses: | 50 |
| Burden per response: | 8 hours |
| Total Burden hours: | 400 hours |

*Assuming funds are appropriated each year.

b. Explanation of How Burden was Estimated.

The Estimates of response burden are based on information requested of selected LEAs on how many hours they expect this response may take them.

c. Labor Cost to Respondent

| | |
|--|---------------------------------|
| Special Education Coordinator/ Personnel: | 4 hrs. @ \$28.00/hr = \$ 112.00 |
| Business Manager/ Personnel: | 3 hrs. @ \$36.58/hr = \$ 109.74 |
| Clerk: | 1 hr. @ \$ 12.50/hr = \$ 12.50 |
| Total labor burden per respondent: | = \$ 234.24 |

Total labor Burden for 50 LEAs = \$11,712.00

13. Estimates of Other Cost Burden for the Respondent for Collection of Information

a. Total Capital and Start-up Cost

There are no capital or start-up costs associated with this information collection. Respondent will not need to purchase equipment or services to respond to this collection.

b. Operation and Maintenance Cost

There are no operation or maintenance costs associated with this information collection.

14. Estimates of Cost to the Federal Government

a. SD Form 816 and SD Form 816C (combined)

Obtaining data from the ED and initial review:

GS-14, Program Analyst

Hourly Cost GS-14 (\$48.46/hr.) X 5 hrs = \$ 242.30

Processing letter and form for DoD coordination:

GS-14, Program Analyst

Hourly cost GS-14 (\$48.46/hr) X 2 hrs = \$ 96.92

Processing letter and form for mailing:

GS-9, Administrative Assistant

Hourly cost GS-9 (\$23.78/hr.) x 8 hrs = \$ 190.24

Mailing:

Postage \$1.11 X 410 mailings = \$ 455.10

Initial review and processing:

GS-14, Program Analyst

Hourly cost GS-14 (\$48.46/hr) X 80 hrs = \$3,876.80

GS-9, Administrative Assistant

Hourly cost GS-9 (\$23.78/hr) X 40 hrs= \$ 951.20

Processing:

GS-9, Finance Clerk, DoDEA

Hourly cost GS-9/5 (\$23.78/hr.) X 8 hrs. = \$ 190.24

GS-9, Finance Clerk, DFAS

Hourly cost GS-9/5 (\$23.78/hr.) X 2 hrs = \$ 47.56

Total Annual Cost to Federal Government: \$6,050.36

15. Changes in Burden

There are no changes in burden to this information collection.

16. Publication Plans/ Time Schedule

The results of the collection of this information will not be published for statistical use.

17. Approval Not to Display Expiration Date

Approval not to display the expiration date is not being sought.

18. Exceptions to the Certification Statement

No exception to the certification statement is being sought.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

Statistical methods are not employed for collection of this information.