# SUPPORTING STATEMENT
# FOR PAPERWORK REDUCTION ACT SUBMISSION

### OMB No. 1810-0687

### Impact Aid Program – Application for Section 8003 Assistance

**A. Justification**

**1.  Explain the circumstances that make the collection of information necessary.  Identify any legal or administrative requirements that necessitate the collection.  Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The U.S. Department of Education is requesting an extension for the Application for Assistance under Section 8003 of Title VIII of the Elementary and Secondary Education Act (ESEA) as amended by No Child Left Behind (NCLB).  This is a grant application for a grant program otherwise known as Impact Aid Basic Support Payments.  Local Educational Agencies (LEAs) whose enrollments and revenues are adversely impacted by Federal activities use this form to request financial assistance.  Regulations for the Impact Aid Program are found at 34 CFR 222.

The statute and regulations for this program require a variety of data from applicants annually to determine eligibility for the grants and the amount of grant payment under the statutory formula.  The least burdensome method of collecting this required information is for each applicant to submit this data through a web-based electronic application hosted on the Department of Education's G5 website.

This application is approved under OMB 1810-0687 and there are no substantive changes to this application.  The Department of Education is requesting an extension of its three-year clearance under the same collection number.

**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 Impact Aid Program, authorized by Title VIII of the Elementary ESEA, provides financial assistance to LEAs whose enrollment or revenues are adversely affected by Federal activities.  ED uses data collected from the Impact Aid application to provide financial assistance to LEAs.

The statute and implementing regulations (34 CFR Part 222) require information from applicants annually to determine eligibility for and the amount of payments.  The least burdensome method of collecting this required information is for each applicant to submit it as part of its annual Impact Aid application, approved under OMB 1810-0687.

**3.  Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision of**

**adopting this means of collection.  Also describe any consideration given to using technology to reduce burden.**

Impact Aid Program Section 8003 applications are prepared and submitted through an electronic application system.  E-application offers recurring LEA applicants significant advantages in preparing the application because it pre-populates the e-application with much of the LEA's identifying information and Federal property codes.  The e-application automatically checks for completion of all necessary items and includes arithmetic checks for table subtotals and the application total.  This software reduces the number of errors in applications submitted to ED.

The e-application is used only by LEAs to submit their Section 8003 applications, not by the respondents to the LEAs.  As a result, the percentage of responses collected electronically is less than one percent.

**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.**

The information requested under this collection is not duplicated in any other data collection, is unique to this program and the particular applicants, and is intended to serve specific purposes mandated by the statute.

**5.  If the collection of information impacts small businesses or other small entities (Item 8b of IC Data Part 2), describe any methods used to minimize burden.**

Small businesses are not impacted by this data collection.

**6.  Describe the consequences 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 burden.**

The statute requires applicants to apply for funds annually and authorizes the payment of funds based upon those annual applications.  Without the annual information, the Department would not be able to disburse these funds efficiently and accurately.  In addition, some information collected through the application is used to monitor that recipient LEAs are meeting statutory requirements.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;

- in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;

- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or

- requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

The regulations do not require the information collection to be conducted in a manner inconsistent with the requirements of 5 CFR 1320.

**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. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

The Impact Aid Program Director regularly consults formally and informally with applicant LEAs, as well as with the leaders of the National Association for Federally Impacted Schools, the National Council of Impacted Schools, the National Indian Impacted Schools Association, and the Military Impacted Schools Association. These consultations have yielded insight into the difficulties that school officials may have in completing the applications. The Department attempts to mitigate these problems whenever possible and uses these consultations to provide the most accurate burden assessments and has the least burden to respondents.

In accordance with 1320.8(d) the Department published a 60 and 30-day Federal Register Notice, with no public comments.

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

The information collection does not require gifts or payments to be made to respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

The information collection requires no assurance of confidentiality. There are no assurances of confidentiality.

**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 justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

The information collection does not include any questions of a sensitive nature.

12. **Provide estimates of the hour burden of the collection of information. The statement should :**

**Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**

**If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in item 16 of IC Data Part 1.**

**Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

As presented in greater detail below, we estimate that it will require 20.25 hours per LEA applicant to collect, organize and prepare the application for Impact Aid Section 8003 assistance. Additionally, we estimate approximately 15 minutes per parent respondent to fill out the survey required by the LEA to complete the application. Approximately half of the LEAs will also contact a local Federal official to collect residence information for certain federally connected students through a source check. We estimate that each source check will average three hours of time to complete.

These estimates were developed by program staff with prior experience in the administration of the Impact Aid Program and have decreased by 404 hours due to a burden assessment from the last fiscal year data was collected. An additional summary is provided in the below tables further detailing these burden calculations.

**Annual Burden Hours**

| By regulatory section or subsection | Total Annual Burden Hours |
|---|---:|
| 34 CFR 222.35, Tables 1-5 | 139,610 |
| 34 CFR 222.50-53, Tables 1, 2, and 7 | 1,786 |
| 34 CFR 222.37, Table 6 | 1,311 |
| Table 8 | 5 |
| Table 9 | 188 |
| Table 10 | 40 |
| Table 11 | 2 |
| **TOTAL** | **142,942** |

**Annual Task: Counting and Reporting Numbers of Federally-Connected Children on Tables 1-5**

| Data Collection Task | Respondents | Average Hours per Respondent | Total Hours | Explanation |
|---|---|---|---:|---|
| Parent-pupil survey | 500,000 parents | 0.25 | 125,000 | Assumes 500,000 federally-connected children identified through a survey form completed by a parent |
| Source check with Federal official to document children living on Federal property | 500 LEAs | 3 | 1,500 | Assumes 500 officials with information on the residence status of federally-connected children complete a source check |
| Collecting and organizing data to report on Tables 1-5 | 1,311 LEAs | 10 | 13,110 | Assumes time to complete and organize survey/source check data on federally-connected children averages ten hours |
| **Total** | | | **139,610** | |

**Additional LEA Annual Reporting Tasks – Tables 1, 2 and 6-11**

| Task | Respondents[1] | Average Hours per Respondent | Total Hours | Explanation |
|---|---|---|---|---|
| Collecting and reporting data on federally-connected children with disabilities and expenditures on Tables 1, 2 and 7 | 893 LEAs | 2 | 1,786 | During the FY 2011 application cycle, 893 LEAs identified federally-connected children with IEPs and reported extra expenditures for children with disabilities |
| Reporting enrollment and attendance data on Table 6 | 1,311 LEAs | 1 | 1,311 | Assumes each applicant uses data already collected and reported to its state education agency |
| Reporting children educated in federally-owned school buildings on Table 8 | 5 LEAs | 1 | 5 | Assumes applicants maintain data on children housed in the small number of schools owned by ED but operated by LEAs |
| Reporting military base housing that is vacant and under renovation on Table 9 | 47 LEAs | 4 | 188 | Assumes LEAs can obtain data from military base housing officers and record the addresses of housing units within an average of four hours |
| Reporting expenditures of Section 8007 funds on Table 10 | 159 LEAs | 0.25 | 40 | Assumes these applicants have ready access to financial reports to retrieve and report these data |
| Reporting Indian housing vacant and under renovation on Table 11 | 1 LEA | 2 | 2 | Assumes applicants can easily retrieve these addresses from the local Indian Housing office |

[1] FY 2011 application cycle.

**Estimates of annualized cost to respondents:**

**Parent Respondents**

Estimating respondent cost at an average of $10/hour for parents completing the survey forms would be:

- $10/hour x 500,000 parents x 0.25 hours = **$1,250,000** per year

**LEA Respondents**

Estimating respondent costs at an average of $12/hour for school staff collecting the survey forms, populating source check forms, organizing the data, and completing the application:

- $12/hour x 17,942 hours = **$215,304** per year

**Annual Total Costs**

Total estimated annual cost to the public of this collection is **$1,465,304.**

13. **Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)**

***The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and acquiring and maintaining record storage facilities.***

***If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.***

***Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.***

The only costs to respondents are those shown above for staff time for data collection and reporting. There should be no record-keeping costs beyond those covered under customary and usual business practices.

14. **Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

Federal costs associated with this collection of information are generally those normally associated with Department staff conducting program monitoring.

| **Application Receipt and Logging** | | | | |
|---|---|---|---|---|
| Signed Assurances Received | Hours per Application | Total Staff Hours | Wage Rate for Personnel[2] | Total Receipt and Logging Cost |
| 1,311 | 0.25 hours | 327.75 | $35.88 | $11,760 |

| **Application Review** | | | | | | |
|---|---|---|---|---|---|---|
| Applications | Time in Property Review per Application | Total Hours | Wage Rate for Personnel[3] | Total Personnel Cost | Other Costs | Total Cost of Review |
| 1,311 | 4 hours | 5,244 | $46.64 | $244,580 | 100 | $244,680 |
| | | | | | | |
| Applications | Time in Application Review per Application | Total Hours | Wage Rate for Personnel | Total Personnel Cost | Other Costs | Total Cost of Review |
| 1,311 | 24 hours | 31,464 | $46.64 | $1,467,481 | 0 | $1,467,481 |

**Total $1,723,921**

**15. Explain the reasons for any program changes or adjustments to #16f of the IC Data Part 1 Form.**

There is an adjustment decrease of 404 hours, after assessing the total number of respondents for each part of the application, rather than an estimate, ED is able to provide a more precise burden assessment of the total time required. The time to complete each part of the application has not changed since it was last approved.

[2] 2011 Pay rate for a GS-12/1 = $35.88

[3] 2011 Pay rate for a GS-12/10 = $46.64

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.**

The collection of information does not require publication of the information or use of complex analytical techniques.

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

The OMB approval number will be displayed on the forms.

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

There are no proposed exceptions to the certifications.