

Supporting Statement

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

SUPPORTING STATEMENT – PART A

A. JUSTIFICATION

1. Need for the Information Collection

The National Defense Authorization Act for Fiscal Year (FY) 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 the high cost of educating qualifying military dependent children with severe disabilities. The National Defense Authorization act for FY 2013, Section 562, P.L. 112-239 (effective January 2, 2013), provided funding in FY 2013 for this program. The prescribing authority is Department of Defense Instruction 1342.18, Financial Assistance to Local Educational Agencies (LEAs). This information collection is needed to determine those qualified LEAs who are eligible to receive payment.

2. Use of the 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 LEA to be determined eligible to receive payment for costs incurred in providing a free and appropriate public education to each child described in subparagraph (A)(ii), (B), (D)(i) or (D)(ii) of section 8003(a)(I) of the Elementary and Secondary Education Act of 1956, as amended (20 U.S.C. 7703(a)), 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 the 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 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, “Application for Department of Defense Impact Aid for Children with Severe Disabilities, Continuation Sheet” is available electronically, and guidelines for applying are listed on the Department of Defense Education Activity (DoDEA) Impact Aid Web site,

(<http://www.militaryk12partners.dodea.edu/impact.cfm?colId=disabilities>) for those LEAs identified by ED to collect the relevant data. 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 DoDEA to Finance and Accounting Service (DFAS) officials to make electronic payments to the qualifying LEAs.

3. Use of Information Technology

The SD Form 816 and SD Form 816C are available to the LEAs electronically online from the DODEA Web site (<http://www.militaryk12partners.dodea.edu/impact.cfm?colId=disabilities>) in a fillable Adobe PDF format. The forms can be signed physically or electronically and submitted via e-mail or fax.

4. Non-duplication

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

5. Burden on Small Business

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

6. Less Frequent Collection

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 appropriate funds.

7. Paperwork Reduction Act Guidelines

This collection will be conducted in a manner consistent with guidelines contained in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

a. The Agency's 60-day Federal Register Notice, required by 5 CFR 1320.8(d), was published on Monday, December 2, 2013 (78 FR 72065), soliciting comments on the information

collection prior to submission to OMB. No public comments received. The Department's 30-day Federal Register Notice was published on Monday, March 3, 2014 (79 FR 1170). Comments will be accepted by OMB through April 2, 2014.

SD Form 816 and SD Form 816C have been in use and tested since 2003. Less than 2% are questioned or mis-routed.

b. According to 20 USC § 7703a:

Each local educational agency desiring a payment under subsection (a) of this section shall report to the Secretary of Defense—

(1) the number of severely disabled children for which a payment may be made under this section;

and

(2) a breakdown of the average cost, by placement (inside or outside the boundaries of the school district of the local educational agency), of providing education and related services to such children.

9. Gifts or Payment

No gifts or payments will be made to respondents.

10. Confidentiality

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

Privacy Act Statement: N/A

System of Records Notice (SORN): N/A

Privacy Impact Assessment (PIA): N/A

11. Sensitive Questions

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

12. Respondent Burden and Labor Costs

a. Estimation of Respondent Burden Hours

Special Education Coordinator/Personnel: 4 hrs.

Business Manager/Personnel: 3 hrs.

Clerk: 1 hr.

Total annual burden hours per LEA: 8 hrs.

Total annual burden hours for 50 LEAs: 400 hrs.

b. Labor Cost to Respondent Burden

Special Education Coordinator/Personnel: 4 hrs. @ \$47.00 per 1 hr. = \$188
Business Manager/Personnel: 3 hrs. @ \$29.00 per 1 hr. = \$87
Clerk: 1 hrs. @ \$19.00 per hr. = \$19
Total labor burden per respondent = \$294
Total labor burden for 50 LEAs (\$295 per LEA x 50 LEAs) = \$14,700

13. Respondent Costs Other Than Burden Hour Costs

a. There are no capital or start-up costs associated with this information collection. Respondents are not required to purchase any equipment or services to respond to this collection.

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

14. Cost to the Federal Government

Initial review and processing:
GS-13 Program Analyst
Hourly Cost: \$47/hr. x 6 hr. per response: = \$282

Processing:
GS-13 Finance Clerk
Hourly Cost: \$47/hr. x 2 hrs. per response: = \$94

Total Annual Cost to the Federal Government:
8 hrs. per response: = \$376

\$376 per response x 50 annual responses: = \$18,800 (@ 400 hours)

15. Reasons for Change in Burden

There is no change in burden to the information collection for LEAs. Responses do not increase as DoDEA receives one response from each of the 50 LEAs and the number of LEAs has not increased.

There is no change in burden to the Federal Government. DoDEA receives one response from each of the 50 LEAs and the number of LEAs has not increased, therefore the time required to calculate each response the has not changed.

16. Publication of Results

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

17. Non-Display of OMB Expiration Date

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

18. Exceptions to "Certification for Paperwork Reduction Submissions"

No exceptions to the Certification for Paperwork Reduction Submissions are being sought.