

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION

OMB No. 1810-0036
IMPACT AID PROGRAM
APPLICATION FOR SECTION 7002 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 approval for the Application for Assistance under Section 7002 of Title VII of the Elementary and Secondary Education Act (ESEA). This application is for a grant program otherwise known as Impact Aid Payments for Federal Property. Local Educational Agencies (LEAs) that have lost taxable property due to Federal activities request financial assistance by completing an annual application. Please note that this formula grant program was previously authorized under Title VIII of the ESEA (as amended by NCLB), but will move to Title VII under the Every Student Succeeds Act, which reauthorized the ESEA, effective for FY 2017. Regulations for Section 7002 of the Impact Aid Program are found at 34 CFR 222, Subpart B.

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 statute and implementing regulations (34 CFR Part 222, Subpart B) require annual data from LEA applicants. ED uses this data to determine an LEA's eligibility for the program and the amount of the applicant's grant award. The least burdensome method of collecting this required information is for each applicant to submit it as part of its annual Impact Aid application, previously approved under OMB 1810-0036.

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.

Applicants prepare and submit these applications through an e-application on ED's www.g5.gov website. The e-application offers recurring LEA applicants significant advantages in preparing the application because it pre-populates

much of the LEA's identifying information and Federal property data. 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.

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 these collections 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, describe any methods used to minimize burden.

Small businesses are not impacted by this data collection. Approximately 250 small LEAs complete this application. Program regulations clarify and standardize the reported information to minimize the burden for all applicants. Additionally, LEAs complete the application online through a program that pre-populates data from the LEA's previous application. This means that the applicant only needs to enter information if it has changed from the prior year.

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.

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 1320.5.

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 (NAFIS), the National Council of Impacted Schools (NCIS), 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. Both a 60- and 30-day Federal Register Notice (FRN) were published, the Department did not receive any comments during the 60-day FRN.

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.

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 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.

For information collected beginning with the FY 2018 application (application due January 31, 2017), we estimate that it will require 1.5 hours per LEA respondent. 250 responses at 1.5 hours per response equals 375 total burden hours. The cost per response, at an average of \$30 per hour for LEA staff, is \$45 (\$30/hour x 1.5 hours). The total estimated annual cost to the public of this collection is \$11,250 (\$30/hour x 375 total burden hours).

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.

Total Annualized Capital/Startup Cost : _____
 Total Annual Costs (O&M) : _____

 Total Annualized Costs Requested : _____

The only costs to respondents are those shown above for staff time for data collection and reporting. There should be no 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 those normally associated with Department staff conducting program monitoring.

Application Receipt and Logging				
Applications	Hours per Application	Total Staff Hours	Wage Rate for Personnel ¹	Total Receipt and Logging Cost
250	0.25 hours	62.5	\$36.60	\$2,288

Application Review				
Applications	Time in Review per Application	Total Staff Hours	Wage Rate for Personnel ²	Total Cost of Review
250	3 hours	750	\$47.58	\$35,685

¹ 2016 Pay rate for a GS-12/1 = \$36.60

² 2016 Pay rate for a GS-12/10 = \$47.58

Total \$35,685

15. Explain the reasons for any program changes or adjustments.

There are no program changes or adjustments to the approved annual burden. Minor changes to the ICR and Fed costs include: The application's assurances are longer, although have not changed in substance. Previously, the general, non-construction program assurances and certification regarding lobbying required of all Federal grant applicants were incorporated into the application assurances by reference. We would have each applicant fill out a "full assurances package" with non-construction program assurances and certification regarding lobbying just once, and then we would keep these on file for each applicant. We did this when we used a paper-based application process in order to cut down on annual paper use. We are not concerned about the amount of pages now that the application is electronic, and we are also afraid that applicants may not be fully aware of the requirements in the full assurances package when they are not seeing them each year. Although the assurances pages now contain all of the assurances an applicant will need to make, including the general assurances and certification regarding lobbying, we will only require one signature, so the burden to the applicant will not change.

In addition, the cost to the Federal Government to review each Section 7002 application has decreased significantly since this information collection was last approved three years ago. Three years ago, LEAs were transitioning to a new funding formula and a revised grant application. Due to the extra training necessary for LEAs and the intense scrutiny required of the new data, Federal government staff were spending an estimated 18 hours per application to review it and prepare the data for payment. Now that LEAs have largely been appropriately trained, and our application and payment processing system has been updated to handle the data and payment calculation, program analysts are spending an average of 3 hours per application. This decreases the cost to the Federal government from \$216,398 to \$35,685.

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.