

## SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a hard copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information, or you may provide a valid URL link or paste the applicable section<sup>1</sup>. Specify the review type of the collection (new, revision, extension, reinstatement with change, reinstatement without change). If revised, briefly specify the changes. If a rulemaking is involved, make note of the sections or changed sections, if applicable.

*The U.S. Department of Education is requesting approval for the Application for Assistance under Section 7003 of Title VIII of the Elementary and Secondary Education Act (ESEA) as amended by the Every Student Succeeds Act (ESSA). This application is 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 these data through a web-based electronic application hosted on the Impact Aid Grant System (IAGS) website.*

*This application is approved under OMB 1810-0687. The Department of Education is requesting a revision 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 VII of the Elementary and Secondary Education Act (ESEA), provides financial assistance to local educational agencies (LEAs) whose enrollment or revenues are adversely affected by Federal activities. 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, previously approved under OMB 1810-0687.*

*ED is now requesting to revise this collection. Previously, applicants submitted applications through ED's G5 website. Now, the Impact Aid Program is developing its own online grants*

<sup>1</sup> Please limit pasted text to no longer than 3 paragraphs.

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*management system to better serve the local educational agencies who receive Impact Aid funds. Grantees will now be able to submit the annual application through the Impact Aid Grant System. The program has revised the application to be more user-friendly and reduce burden. The data collected on the application is largely the same. All changes are summarized below.*

- *The program regulations at 34 CFR §222.33 require that LEAs survey their Federally connected children “no earlier than the fourth day of the regular school year.” In order to monitor this, we will have each applicant enter the first day of school for students.*
- *We now require first-time Charter School LEA applicants to submit their charter and their annual financial report at the time of application. The program has always required new charter school applicants to submit this information in order to verify that the school is financially independent and able to apply on its own behalf as an LEA, per the statutory definition in 20 USC 7713; however, they were requested after the charter school submitted the application. We are now asking for these documents with the application to speed the review process.*
- *Another change requires applicants to affirm they have enough children to qualify for categories F and G before being allowed to enter child counts in those categories. This is intended to save them effort in data entry. This does not require any additional submissions with the data collection.*
- *We no longer require the Housing Official Certification form. We ask only for the Housing Official’s contact information so that we may obtain data required to calculate housing renovation claims directly from the official.*

*We have eliminated the requirement to upload a signed cover page and assurances page, and will permit applicants to sign the required attestations and certifications electronically.*

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 7003 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, previous year’s data, and only displays data entry forms that are needed for that particular LEA. 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 7003 applications, not by the respondents to the majority of LEA applicants. Very few LEAs have the necessary information collection infrastructure receive parent-pupil survey responses electronically. As a result, the percentage of responses collected electronically is less than five percent.*

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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. A small entity may be (1) a small business which is deemed to be one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction, which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.

*Small businesses are not impacted by this data collection. Approximately 500 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. 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;

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- 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. As applicable, state that the Department has published the 60 and 30 Federal Register notices as 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 Department is requesting and will consider any comments received during the 30-day public comment period. A Federal Register notice was published May 8, 2019 (Vol. 84, page 20110) requesting public comment on this information collection. No comment was received during the 60-day public comment period. This is a request for the 30-day public comment period.*

*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*

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*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 has attempted to mitigate as many of these problems as possible in the new Impact Aid Grant System.*

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

*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. If personally identifiable information (PII) is being collected, a Privacy Act statement should be included on the instrument. Please provide a citation for the Systems of Record Notice and the date a Privacy Impact Assessment was completed as indicated on the IC Data Form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided.<sup>2</sup> If the collection is subject to the Privacy Act, the Privacy Act statement is deemed sufficient with respect to confidentiality. If there is no expectation of confidentiality, simply state that the Department makes no pledge about the confidentiality of the data.

*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 a sensitive nature.*

12. Provide estimates of the hour burden of the collection of information. The statement should:
  - Indicate the number of respondents by affected public type (federal government, individuals or households, private sector – businesses or other for-profit, private sector – not-for-profit institutions, farms, state, local or tribal governments), frequency of response, annual hour burden, and an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. All narrative should be included in item 12. Unless directed to do so, agencies should not conduct special surveys to obtain information on which

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<sup>2</sup> Requests for this information are in accordance with the following ED and OMB policies: Privacy Act of 1974, OMB Circular A-108 – Privacy Act Implementation – Guidelines and Responsibilities, OMB Circular A-130 Appendix I – Federal Agency Responsibilities for Maintaining Records About Individuals, OMB M-03-22 – OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002, OMB M-06-15 – Safeguarding Personally Identifiable Information, OM:6-104 – Privacy Act of 1974 (Collection, Use and Protection of Personally Identifiable Information)

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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 the ROCIS IC Burden Analysis Table. (The table should at minimum include Respondent types, IC activity, Respondent and Responses, Hours/Response, and Total Hours)
- 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 82.8<sup>3</sup> hours per LEA applicant to collect, organize and prepare the application for Impact Aid Section 7003 assistance. This includes the burden hours for approximately half of the LEAs that contact a local Federal official to collect residence information related to the collection of source check data as well as the 15 minutes per parent respondent to fill out the survey required by the LEA to complete the application.*

*These estimates were developed by program staff with prior experience in the administration of the Impact Aid Program. The summary tables contain a fuller explanation of the calculations.*

#### **Annual Burden Hours**

<b>By regulatory section or subsection</b>	<b>Total Annual Burden Hours</b>
<i>34 CFR 222.35, 34 CFR 222.50-52 Categories A - G</i>	87,021.5
<i>34 CFR 222.37, Membership and ADA</i>	100
<i>34 CFR 222.53, Fiscal Report of Expenditures for CWD</i>	203.5
<i>34 CFR 222.141-143, US DoED Schools</i>	5
<i>Fiscal Report Construction Expenditures</i>	45

<sup>3</sup> There are a total of 87,656 burden hours that includes both the time that it takes the LEA to collect, analyze, and report the data as well as the time it takes respondents to complete survey forms or officials to certify source check documents. (87,656 total hours ÷ 1,079 LEAs = 81.2).

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<i>Indian Policies and Procedures (IPPs)</i>	280
<i>New Charter School Charter Documents and Financial Report</i>	1
<b>TOTAL</b>	87,656
<i>Average Burden Hours Per Applicant</i>	81.2

**Annual Task: Counting and Reporting Numbers of Federally-Connected Children in Categories A - G**

<b>Data Collection Task</b>	<b>Respondents</b>	<b>Average Hours per Respondent</b>	<b>Total Hours</b>	<b>Explanation</b>
<i>Parent-pupil survey</i>	<i>300,000 parents</i>	<i>0.25</i>	<i>75,000</i>	<i>Assumes 300,000 federally-connected children identified through a survey form completed by a parent.</i>
<i>Source check with Federal official to document children living on Federal property</i>	<i>950 LEAs</i>	<i>3</i>	<i>2,850</i>	<i>Assumes 1000 officials with information on the residence status of federally-connected children complete a source check</i>
<i>Collecting and organizing data to report on Categories A-G</i>	<i>1,079 LEAs</i>	<i>8.5</i>	<i>9,171.5</i>	<i>Assumes time to complete and organize survey/source check data on federally-connected children decreased from 9 hours to 8.5 hours due to improvements in data validation and organization of application.</i>
<b>Total</b>			<b>87,021.5</b>	

**Additional LEA Annual Reporting Tasks – Membership and ADA and Supplemental Forms**

<b>Task</b>	<b>Respondents<sup>4</sup></b>	<b>Average Hours per Respondent</b>	<b>Total Hours</b>	<b>Explanation</b>
<i>Reporting enrollment and attendance data in Membership and</i>	<i>100 LEAs</i>	<i>1</i>	<i>100</i>	<i>Most applicants use data already collected and reported to its state education agency. All</i>

<sup>4</sup> FY 2020 application cycle.

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ADA				States have an average attendance rate, so LEAs in States are no longer required to report ADA data. Approximately 100 LEAs are either in Washington, DC or the territories, or use alternative methods to reach a higher average daily attendance number, and must submit attendance data per 34 CFR §222.37.
Collecting and reporting expenditure data for federally-connected children with disabilities in Fiscal Report on Expenditures for CWD	814 LEAs	0.25	203.5	Assumes these applicants have ready access to financial reports to retrieve and report these data
Reporting children educated in federally-owned school buildings in the section for US DoED Schools under Categories B and Di	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 expenditures of Section 7007 funds on Fiscal Report of Expenditures for Construction-Related Funds and Accounts	180 LEAs	0.25	45	Assumes these applicants have ready access to financial reports to retrieve and report these data
Indian Policies and Procedures (IPPs)	560	0.5	280	Assumes applicants have copies of this document readily available, and that the required LEA board approval takes less than fifteen minutes.



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<i>Locating contact Information for Housing Official</i>	10	0	0	<i>This information only needs to be filled out by LEAs who have qualifying housing undergoing renovation or rebuilding. The time associated with obtaining this information is too small to calculate (&lt;5 minutes per applicant)</i>
<i>Submitting Charter Documents and Annual Financial Report</i>	2	0.5	1	<i>On average, Impact Aid has two new charter school applicants per year. Assumes applicants have these documents readily available in electronic format.</i>

**Estimates of annualized cost to respondents:**

<i>Respondent</i>	<i>Rate \$/hour</i>	<i># of Respondents</i>	<i>Respondent Total Time (avg)</i>	<i>Cost</i>
<i>Parent Respondents</i>	10	300,000	.25 hours	\$750,000
<i>LEA Respondents</i>	15	1,079	8.5	\$137,572.50
<i>Total Cost</i>				\$887,572.50
<i>Prior Cost Estimate</i>				\$1,058,140
<i>Cost Change</i>				-\$170,567.50

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

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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. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12

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 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.*

<b>Application Review</b>						
<i>Applications</i>	<i>Time in Review</i>	<i>Total</i>	<i>Wage Rate</i>	<i>Total</i>	<i>Other</i>	<i>Total Cost</i>

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	<i>per Application</i>	<i>Hours</i>	<i>for Personnel<sup>5</sup></i>	<i>Personnel Cost</i>	<i>Costs</i>	<i>of Review</i>
1,079	25 hours	26,975	\$50.80	\$ 1,370,330	0	\$ 1,370,330

Total \$ 1,370,330

15. Explain the reasons for any program changes or adjustments. Generally, adjustments in burden result from re-estimating burden and/or from economic phenomenon outside of an agency's control (e.g., correcting a burden estimate or an organic increase in the size of the reporting universe). Program changes result from a deliberate action that materially changes a collection of information and generally are result of new statute or an agency action (e.g., changing a form, revising regulations, redefining the respondent universe, etc.). Burden changes should be disaggregated by type of change (i.e., adjustment, program change due to new statute, and/or program change due to agency discretion), type of collection (new, revision, extension, reinstatement with change, reinstatement without change) and include totals for changes in burden hours, responses and costs (if applicable).

*We anticipate a reduction in the burden hours for applicants applying for Impact Aid Section 7003 assistance due to the application's improved data validation features and organization. The most impact will come from the application's new ability to tell LEAs exactly how many Federally connected children they need in order to qualify for a grant payment. Currently, many LEAs are unaware of the different minimum requirements for certain categories of Federally connected children and spend time organizing survey data and entering student counts on the application that will not result in a grant payment. We anticipate this program change will save, on average, 30 minutes per applicant (for a total of 540 hours of burden reduction due to program change). Additionally, the actual number of respondents has declined since we last sought approval for this grant application. Respondents went from 356,264 in the FY 2015 grant cycle to 301,079 in the FY 2020 grant cycle. As the number of applications decrease, this results in fewer parents and agency officials needing to respond to an Impact Aid pupil survey or source check. In all, changes due to adjustment in the agency's estimate results in 16,524 fewer burden hours. In total, we estimate that it will require an average of 81.2 hours per LEA applicant to collect the required data, organize it, and prepare the application for Impact Aid Section 7003 assistance. This burden includes LEA staff time, as well as parent and certifying official time.*

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.*

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<sup>5</sup> 2018 Pay rate for a GS-12/10 = \$50.80

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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.*