

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 section¹. 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 Additional Supplemental Appropriations for Disaster Relief Act, 2019 (P.L. 116-20, hereafter referred to as the Disaster Supplemental) was signed into law by President Trump on June 6, 2019. The law provides \$165 million for education-related disaster recovery activities for certain natural disasters in 2018 and 2019 (covered disasters) for which a major disaster or emergency has been declared by the President.

The Department of Education plans to use the discretion afforded to the Secretary by the Disaster Supplemental to implement four programs: Immediate Aid to Restart School Operations program (Restart), Temporary Emergency Impact Aid for Displaced Students (Emergency Impact Aid), Emergency Assistance to Institutions of Higher Education program (Emergency Assistance to IHEs), and Project School Emergency Response to Violence (Project SERV).

The purpose of the Restart program is to help local educational agencies (LEAs) and non-public schools defray expenses related to the restart of operations in, the reopening of, and the re-enrollment of students in elementary and secondary schools that serve an area affected by a covered disaster. The purpose of the Emergency Impact Aid program is to provide funds to assist with the cost of educating public and non-public students displaced as a result of a covered disaster. The purpose of the Emergency Assistance to IHEs program is to provide emergency assistance to institutions of higher education and their students in areas directly affected by a covered disaster. Project SERV's purpose is to fund education-related services for LEAs and IHEs to help them recover from a violent or traumatic event in which the learning environment has been disrupted.

Funding amounts

Of the total \$165 million for education-related disaster recovery activities, the Department will set aside approximately \$155 million for new awards for the Restart, EIA, and Emergency Assistance for IHEs programs. The amounts awarded under each program will be based on the number of applicants and the impact data and estimated or actual recovery costs provided by applicants. While we do not have sufficient information at this time to determine precisely the amounts to be awarded under each

¹ Please limit pasted text to no longer than 3 paragraphs.

program, our informal outreach to affected areas indicates that the majority of the funds will be needed for the Restart program.

The approximately \$10 million remaining will be used to reimburse Project SERV, Office of Inspector General (OIG) oversight activities and Department of Education program administration costs.

The funding opportunity that requires submission clearance under this notice is:

(1) Temporary Emergency Impact Aid for Displaced Students

Under this program, the Department will award Emergency Impact Aid funding to State education agencies (SEAs) to help defray expenses related the enrollment of displaced students in elementary and secondary schools immediately following a covered disaster. The SEAs, in turn, will provide assistance to Local education agencies (LEAs) and non-public schools for the cost of educating students enrolled in public schools, including charter schools, and nonpublic schools who were displaced by the covered disaster.

Timeline

The Department of Education (Department) is requesting an extension of this information collection. This collection will be used if this program receives funding in the future. The Department, due to the severe impact (e.g., physical, social, emotional) of the natural disasters for which the Department has received funding previously to minimize the disruption to teaching and learning, has determined that it is critical that these data can be collected quickly. As such, this collection will enable the Department to make timely payments and provide necessary relief without delay.

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.

States, LEAs, and non-public schools incurred considerable expenses enrolling displaced students as the result of covered disasters and are in need of financial assistance. The Department will make payments to SEAs taking into consideration the number of public and non-public students who enrolled in a different public or non-public school as the result of being displaced by a covered disaster. SEAs will make payments to LEAs and non-public schools to fund costs associated with enrolling displaced students.

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.

The application package will be available to States electronically. Applicants may include html references, electronic files, or other existing documentation.

- 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.**

This application is unique to the programs authorized to assist those areas and students affected by the recent named covered disasters and does not duplicate other efforts.

- 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 will not be impacted by this data collection. It is possible that this information collection may impact small LEAs if SEAs reach out for specific impact data. The Department is limiting impact by only requiring damage and need estimates, so as to minimize burden on SEAs and small LEAs.

- 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.**

If this data approval is not approved, states could not provide the much needed financial assistance to aid their districts and schools in restoring the learning environment, thus slowing the continuing recovery efforts that have been taking place since Spring 2018. Those states, districts and schools have been waiting for additional financial support for up to fourteen months. The normal process would result in the Department not being able to provide full awards until early winter 2019, a full year and a half after some of the disasters.

- 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.**

There are no special circumstances that would require OMB approval.

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.

On August 28, 2019 a Federal Register Notice was published requesting an emergency/60-day public comment period(Vol. 84, No. 167, page 45136). One comment was received that is not relevant to the content of the application. This request is for the 30-day comment period.

9. **Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees with meaningful justification.**
No payment or gifts will be provided 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.² 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.**

There are no assurances of confidentiality; the Department will not collect any personally identifiable information.

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.**

There are no 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 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**

² 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)

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.**

The Department estimates that up to 56 SEAs will apply for the Emergency Impact Aid program when funding is made available. Please note, while 56 is the number of eligible applicants, the number of applicants could be much lower given that not every SEA will have LEAs and non-publics schools that enrolled students displaced as the result of a natural disaster. Given 56 applicants, the Department estimates that it will take approximately 40 hours to complete each application for a total of 2,240 hours. Assuming that individuals at the agencies and institutions of varying career levels work on the project, we estimate an average of about \$40/hour, which is roughly equivalent to the Federal GS-12 level. Accordingly, we anticipate a total cost of \$89,600.

Exhibit 1. Estimated burden hours

Program Year	Number of Responses	Type of Staff	Average Burden Hours per Response	Total Burden Hours
2019	Up to 56	Assuming that individuals at the agencies and institutions of varying career levels work on the project, the general level associated with staff collecting and submitting the data is roughly equivalent to the Federal GS-12 level.	40	2,240

Exhibit 2. Estimated costs

Year	Respondent	Average Burden Hours per Response	Hourly Rate	Average Total Cost Per Response	# of Responses	Total Annual Costs
2019	State Educational Agency	40	\$40	\$1,600	56	\$89,600

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. 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 :

This collection does not require Capital/Start-up cost or equipment and maintenance costs.

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.

We estimate that Federal staff will spend an average of 3 hours per application to review this information. The total number of applications from SEAs under this program is estimated to be 56. We estimate total hours of review for these applications to be 168. Different staff members at different pay levels are likely to participate in review, so we will use \$40 as the average hourly rate, which is approximately the GS-12 level for a Federal employee in Washington, DC. At \$40 per hour, the total hours of review comes to an annual cost of \$6,720 to the Federal government.

- 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).**

There is no burden change for this collection. The annual burden is an estimated total of 2,240 burden hours.

- 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 Department will not be analyzing and publishing data amassed through this collection.

- 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 expiration date for OMB approval of the information collection will be displayed.

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

We do not propose any exceptions to the certification statements identified in the Certification of Paperwork Reduction Act.