

## SUPPORTING STATEMENT – PART A

Application for Department of Defense Impact Aid for Children with Severe Disabilities for School Year 20xx – 20xx; SD Form 816 and SD 816c; OMB Control Number 0704-0425

### 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 prescribing authority is Department of Defense Administrative Instruction 1325.01, Department Of Defense Impact Aid Program for Local Educational Agencies. This information collection is needed to determine those qualified LEAs who are eligible to receive payment.

Authorized under Title 20 U.S.C. § 7703a. (a) Payments, Subject to subsection (f) of this section, the Secretary of Defense shall make a payment for fiscal years after fiscal year 2001, to each local educational agency eligible to receive a payment for a child described in subparagraph (A)(ii), (B), (D)(i) or (D)(ii) of section 7703(a)(1) of this title that serves two or more such children with severe disabilities, for costs incurred in providing a free appropriate public education to each such child.

Authorized under Title 20 U.S.C. § 7703a. (e) Report, 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.

### 2. Use of the Information

The purpose of this information collection is to determine eligibility and calculate payments for eligible respondents (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 1965, 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 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. Each eligible LEA is sent an email stating their eligibility and providing a link to the 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". These documents are available electronically on the Department of Defense Forms Management Website at [https://www.esd.whs.mil/Directives/forms/sd\\_forms/](https://www.esd.whs.mil/Directives/forms/sd_forms/), and include guidelines for completing the application. For additional assistance, LEAs are provided DoD Impact Aid personnel contact information; by phone at (571) 372-5870, or via email at [DoDEAImpactaid@dodea.edu](mailto:DoDEAImpactaid@dodea.edu).

Of the approximately 410 LEAs originally sent to DoDEA by ED, 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, Award letters are distributed to each recipient and 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

100% of the responses are collected electronically. The SD Form 816 and SD Form 816C are available to the LEAs electronically on the Department of Defense Forms Management Website, ([https://www.esd.whs.mil/Directives/forms/sd\\_forms/](https://www.esd.whs.mil/Directives/forms/sd_forms/)) in a fillable Adobe PDF format. The completed application must be signed by physically or digitally by the superintendent of schools or a designated representative authorized to act on behalf of the superintendent, who certifies that the information submitted is accurate. The forms can be submitted to DoDEA via email at [DoDEAImpactAid@dodea.edu](mailto:DoDEAImpactAid@dodea.edu).

### 4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

### 5. Burden on Small Business

This information collection does not impose a significant economic impact on a substantial number of small businesses or 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 of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice for the collection published on Tuesday, November 12, 2019. The 60-Day FRN citation is 84 FR 61043.

A 30-Day Federal Register Notice for the collection published on Wednesday, February 5, 2020. The 30-Day FRN citation is 85 FR 6536.

Part B: CONSULTATION

No additional consultation apart from soliciting public comments through the Federal Register was conducted for this submission.

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. Confidentiality

A Privacy Act Statement is not required for this collection because we are not requesting individuals to furnish personal information for a system of records.

A System of Record Notice (SORN) is not required for this collection because records are not retrievable by PII.

A Privacy Impact Assessment (PIA) is not required for this collection because PII is not being collected electronically.

Disposition Authority Number: DAA-0330-2013-0012-0027. Destroy/Delete when 1 year old or when no longer needed for reference.

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden and its Labor Costs

PART A. ESTIMATION OF RESPONDENT BURDEN – There are approximately 50 applications submitted to DoDEA annually, with 3 respondents at each LEA. These respondents typically include a SPED coordinator to gather the data on eligible SPED students, a business manager to verify the financial data, and a clerk to process the application. The number of students listed on each application varies between 2 and 100 depending on the size of the LEA and the number of qualifying SPED children in attendance.

1) Collection Instrument(s)

[SD 816/816C – LEAs - SPED Coordinator]

- a) Number of Respondents: 50
- b) Number of Responses per Respondent: 1
- c) Number of Total Annual Responses: 50
- d) Response Time: 4 hours
- e) Respondent Burden Hours: 200 hours

[SD 816/816C – LEAs - Business Manager]

- a) Number of Respondents: 50
- b) Number of Responses per Respondent: 1
- c) Number of Total Annual Responses: 50
- d) Response Time: 3 hours
- e) Respondent Burden Hours: 150 hours

[SD 816/816C – LEAs – Clerk]

- a) Number of Respondents: 50
- b) Number of Responses per Respondent: 1
- c) Number of Total Annual Responses: 50
- d) Response Time: 1 hour
- e) Respondent Burden Hours: 50 hour

2) Total Submission Burden (Summation or average based on collection)

- a) Total Number of Respondents: 50
- b) Total Number of Annual Responses: 50
- c) Total Respondent Burden Hours: 400 hours

PART B. LABOR COST OF RESPONDENT BURDEN

1) Collection Instrument(s)

[SD 816/816C – LEAs - SPED Coordinator]

- a) Number of Total Annual Responses: 50
- b) Response Time: 4 hours
- c) Respondent Hourly Wage: \$47
- d) Labor Burden per Response: \$188
- e) Total Labor Burden: \$9,400

[SD 816/816C – LEAs - Business Manager]

- a) Number of Total Annual Responses: 50
- b) Response Time: 3 hours
- c) Respondent Hourly Wage: \$30
- d) Labor Burden per Response: \$90
- e) Total Labor Burden: \$4,500

[SD 816/816C – LEAs – Clerk]

- a) Number of Total Annual Responses: 50
- b) Response Time: 1 hour
- c) Respondent Hourly Wage: \$15
- d) Labor Burden per Response: \$15
- e) Total Labor Burden: \$750

2) Overall Labor Burden

- a) Total Number of Annual Responses: 150
- b) Total Labor Burden: \$14,650

The Respondent hourly wage was determined by using the [Department of Labor Wage Website] (<http://www.dol.gov/dol/topic/wages/index.htm>)

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

14. Cost to the Federal Government

PART A. LABOR COST TO THE FEDERAL GOVERNMENT

1) Collection Instrument(s)

[SD 816/816C – Program Analyst]

- d) Number of Total Annual Responses: 50
- e) Processing Time per Response: 6 hours
- f) Hourly Wage of Worker(s) Processing Responses: \$57
- g) Cost to Process Each Response: \$342
- h) Total Cost to Process Responses: \$17,100

[SD 816/816C – Finance Clerk]

- a) Number of Total Annual Responses: 50
- b) Processing Time per Response: 2 hours
- c) Hourly Wage of Worker(s) Processing Responses: \$57
- d) Cost to Process Each Response: \$114
- e) Total Cost to Process Responses: \$5,700

3) Overall Labor Burden to the Federal Government

- a) Number of Total Annual Responses: 100

b) Total Labor Burden: \$22,800

Source for all wage information used: The data was collected from the DoDEA employees performing each task listed above in FY 2019.

#### PART B. OPERATIONAL AND MAINTENANCE COSTS

1) Cost Categories

- a) Equipment: \$0
- b) Printing: \$0
- c) Postage: \$0
- d) Software Purchases: \$0
- e) Licensing Costs: \$0
- f) Other: \$0

2) Total Operational and Maintenance Cost: \$0

#### PART C. TOTAL COST TO THE FEDERAL GOVERNMENT

1) Total Labor Cost to the Federal Government: \$22,800

2) Total Operational and Maintenance Costs: \$0

3) Total Cost to the Federal Government: \$22,800

15. Reasons for Change in Burden

There has been no change in burden since the last approval.

This is an existing collection currently in use without an OMB Control Number.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.