

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 U.S. Department of Education (the Department) is requesting an extension with an adjustment to the currently approved information collection OMB No. 1810-0662. This collection of information is necessary to collect information under the Title I, Part C Migrant Education Program (MEP). The MEP is authorized under sections 1301-1309 of Part C of Title I of the Elementary and Secondary Education Act of 1965,² as amended (ESEA). Regulations for the MEP are found at 34 CFR §§ 200.81-200.89. This information collection covers regulations with information collection requirements (see below). These requirements pertain to information that State educational agencies (SEAs) must collect in order to properly administer the MEP. Most provisions do not require SEAs to submit the information collected to the Department, with the exception of the provisions under 34 CFR § 200.89(b).

The regulations with information collection requirements are 34 CFR §§ 200.83, 200.84, 200.88, and 200.89(b)-(d). There is one additional MEP regulatory section, 34 CFR § 200.85, which contains information collection requirements. Those information collection requirements, which pertain to the Migrant Student Information Exchange (MSIX), are covered by OMB No. 1810-0683.

- 34 CFR § 200.83 establishes minimum requirements a State Educational Agency (SEA) must meet for development of a comprehensive needs assessment and comprehensive State plan for service delivery as required under section 1306(a) of the ESEA.
- 34 CFR § 200.84 establishes minimum requirements the SEA must meet to implement the program evaluation required under section 1304(c)(5) of the ESEA.
- 34 CFR § 200.88 clarifies for the purposes of the MEP, only "supplemental" State or local funds that are used for programs that meet the intent and purposes of the MEP may be excluded in terms of determining compliance with the "comparability" and "supplement, not supplant" provisions of the statute (section 1118 of the ESEA).

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

² Throughout this document, unless otherwise indicated, citations to the ESEA refer to the ESEA, as amended by the Every Student Succeeds Act (ESSA).

- 34 CFR § 200.89(b) establishes the minimum requirements an SEA must meet to carry out re-interviews of a sample of migratory families. Re-interviews allow SEAs to examine and validate their statewide MEP eligibility determinations, to generate a defect rate for adjusting SEA migratory child counts, if necessary, and to ensure ongoing quality control in future eligibility determinations. This regulatory requirement is consistent with sections 1303(e) and 1309(2)-(5) of ESEA.
- 34 CFR § 200.89(c) establishes minimum requirements an SEA must meet to document its eligibility determinations under the MEP (including the use of a standard Certificate of Eligibility (COE) form). This regulatory requirement is consistent with sections 1303(e) and 1309(2)-(5) of the ESEA.
- 34 CFR § 200.89(d) establishes minimum requirements for a system of quality controls that an SEA must implement to ensure accurate eligibility determinations under the MEP. This regulatory requirement is consistent with sections 1303(e) and 1309(2)-(5) of the ESEA.

A copy of the relevant statute and regulations are attached (Attachment A and B, respectively). One information collection instrument, the National COE Instructions under 34 CFR § 200.89(c), is also provided with this Supporting Statement.

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 needs assessment and service delivery information required by 34 CFR § 200.83 are used by the SEA to design and implement an effective statewide MEP. The evaluation information required by 34 CFR § 200.84 is used by the SEA to assess the effectiveness of the statewide MEP and to promote improved service delivery. The advance written determination by an SEA required by 34 CFR § 200.88(b) (that a State or locally funded program meets the intent and purposes of Part C of Title I) is used by the SEA to support the exclusion of "supplemental" State or local funds in determining compliance with the "comparability" and "supplement, not supplant" provisions of the statute.

The re-interview information required by 34 CFR § 200.89(b) is used by the SEA and the Secretary to estimate the accuracy of program eligibility determinations and to make needed improvements. The information is also used by the Secretary to make necessary adjustments to State MEP allocations; such information was used to adjust FY 2009 MEP allocations. The eligibility materials required by 34 CFR § 200.89(c) are used by SEAs to clearly document the basis for the determination of program eligibility of each migratory child identified by the SEA and for determining which children are eligible for MEP services. The information required by 34 CFR § 200.89(d) is used by the SEA to examine and document the implementation of its quality control system and to enable the SEA to determine and implement necessary improvements.

As noted in response to Item 1, this collection of information does not require SEAs to submit the information collected to the Department except for 34 CFR § 200.89(b). Instead, the

information is for SEAs to use in documenting eligible migratory children and in designing, operating and evaluating their State MEP.

- 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 regulations themselves do not require nor preclude SEAs from using automated, electronic, mechanical, or other technological collection techniques to reduce burden. As noted earlier, most of the information to be collected by SEAs will not be further collected by the Department from the SEAs (with the exceptions of 34 CFR § 200.89(b)). SEAs electronically report as part of the Consolidated State Performance Report (CSPR) the results of the information collected under 34 CFR § 200.89(b)(2). The information collected under 34 CFR § 200.89(b)(1) would be collected, if necessary, via a report that SEAs would send electronically to the Department. Many SEAs will use information technology (e.g., an electronic COE) to collect and analyze data. Facsimile and computer systems will be used to transmit and store data.

- 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 eligibility documentation information, re-interviewing information, quality control process documentation, needs assessment and service delivery information, evaluation information, and the advance written determination supporting the exclusion of "supplemental" State or local funds in determining compliance with the "comparability" and "supplement, not supplant" provisions of the statute required by this collection are unique to this program and the particular grantee. Other than State assessment data to be collected under the Title I assessment requirements for use in 34 CFR §§ 200.83 and 200.84, the information to be collected by the SEA under 34 CFR §§ 200.83, 200.84, and 200.88 and §§ 200.89(b), 200.89(c) and 200.89(d) are not in any other data collection, and are necessary for the SEA to design, implement, and improve its Statewide MEP.

- 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 and entities are not impacted by this data collection.

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 Department would be unable to calculate State MEP allocations and to adjust allocations in cases where SEAs have identified high numbers of ineligible children. In addition, the Department would be unable to monitor adequately SEA implementation and operation of the MEP and use of Federal funds.

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(d)(2).

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.

Program staff consult with grantees regarding these information collection requirements on an ongoing basis, through technical assistance, monitoring, and during meetings with MEP State Directors and other MEP stakeholders. Topics discussed include the requirements for, frequency of data collection, and availability of data needed for States' comprehensive needs assessment, service delivery plan, and program evaluation (34 CFR §§ 200.83 and 200.84); documentation of eligibility decisions through use of the Certificate of Eligibility (34 CFR §§ 200.89(c)); and processes and procedures used to sustain or improve quality control of eligibility determinations (34 CFR §§ 200.89(d)), including processes and procedures for conducting re-interviewing (34 CFR §§ 200.89(b)(2)).

ED published a 60-day Federal Register Notice on January 9, 2020 (Vol. 85, No. 6, page 1153). We received four comments, two of which were substantive and pertained to the information collection. Responses to those comments are provided as an attachment. The 60-day Notice will be followed by a 30-day Federal Register Notice, to solicit additional comments from the public.

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

The regulations do 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.³ 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.

³ 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)

The specific MEP regulations discussed in this information collection package require no assurance of confidentiality. However, because the COE form required under 34 CFR § 200.89(c) is an “education record,” State and local operating agencies are required to comply with the Family Educational Rights and Privacy Act (FERPA) of 1974. FERPA establishes when States and local operating agencies can and cannot disclose “education records” without parental consent.

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 regulations do not require any questions of sensitive nature in this collection of information.

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 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.**

Exhibit 1. Estimated burden hours

IC Activity	Number of Responses	Respondent Type	Average Burden Hours per Response	Total Burden Hours	Total Burden Hours (Annualized)
Needs assessment and State plan for service delivery (34 CFR § 200.83)	46	SEAs	1,043.5	46	12,000
Evaluation (34 CFR § 200.84)	46	SEAs	440	46	5,060
Written determinations re: supplemental State and local funds (34 CFR § 200.88)	46	SEAs	4	46	46
Retrospective re-interviewing (34 CFR §200.89(b)(1))	2	SEAs	1,580	2	1,053
	600	Parents/guardians	0.5	300	100
Prospective re-interviewing (34 CFR §200.89(b)(2))	46	SEAs	152	6,992	6,992
	2,300	Parents/guardians	0.5	1,150	1,150
Eligibility determinations (34 CFR §200.89(c))	46	SEAs	7,269.57	334,400	111,467
	121,600	Parents/guardians	1.5	182,400	60,800
34 CFR §200.89(d)	46	SEAs	640.58	29,467	29,467
TOTAL	121,658¹				228,135

1. Note that total number of responses does not equal the sum of the preceding figures in this column because each SEA and parent is counted once for the entirety of the collection, to avoid duplicating or overcounting responses.

As presented in greater detail below, we estimate that it will require 9,550 – 11,130 hours per SEA respondent and 2 hours per migratory parent to respond to the requirements of these regulations.

We estimate that a total of 46 SEAs will be subject to these requirements because the SEAs for Rhode Island, Connecticut, West Virginia, Wyoming, the District of Columbia, and Puerto Rico no longer participate in the MEP. The requirement to conduct retrospective re-interviewing under 34 CFR § 200.89(b)(1) is a one-time requirement over a three-year period. Because no SEAs have been required to conduct retrospective re-interviews since 2008, we estimate this requirement will apply to no more than 2 SEAs over the next three years. The requirements of 34 CFR §§ 200.83, 200.84, and 200.88 are one-time requirements per ESEA authorization, so burden hours are annualized over a four-year period (ESEA is currently authorized for FYs 2017-2020).

These estimates were developed by program staff with prior experience in the State-level administration of the MEP. [See the tabular summaries below for a more thorough explanation of the calculations.]

§ 200.83: Needs Assessment and State Plan for Service Delivery	Frequency of response	# of Respondents	Average # of Hours per respondent	Total Hours	Description
Data Collection <i>(record-keeping)</i>	One Time	46 SEAs	643.50	29,601	Design and collection of information regarding the needs of migratory children and the availability of services from other programs.
Analysis & Reporting <i>(record-keeping)</i>	One Time	46 SEAs	160	7,360	Analysis of the collected needs assessment data and summary of results.
Plan Development <i>(record-keeping)</i>	One Time	46 SEAs	160	7,360	Development of the comprehensive service delivery plan, including drafting, revisions, and clearance.
Plan Update <i>(record-keeping)</i>	One Time	46 SEAs	80	3,680	Update of the comprehensive service delivery plan in response to the results of program evaluations.
Total for §200.83		46 SEAs	1,043.5	48,001	

§ 200.84 Activities: Evaluation	Frequency of response	# of Respondents	# of Hours per respondent	Total Hours	Description
Data Collection <i>(record-keeping)</i>	One Time	46 SEAs	120	5,520	Collection of project observation data in a 30 percent sample of MEP

					project sites nationally (does not include the time associated with collecting student-level assessment data because student assessment data is exempt from the paperwork clearance process).
Analysis & Reporting (<i>record-keeping</i>)	One Time	46 SEAs	320	14,720	Analysis and summary of data to determine the effectiveness of the State's MEP.
Total for §200.84		46	440	20,240	

§ 200.88 Activities: Exclusion of supplemental State and local funds from supplement, not supplant and comparability determinations	Frequency of response	# of Respondents	# of Hours per respondent	Total Hours	Description
Written determination (<i>record-keeping</i>)	One Time	46 SEAs	4	184	Analysis and preparation of a written determination in support of exclusion.
Total for § 200.88		46	4	184	

200.89(b)(1): Retrospective Re-interviewing	Frequency of response	# of Respondents	Average # of Hours per respondent	Total Hours	Description
Re-interviews (<i>record-keeping</i>)	One Time	2 SEAs	1,200	2,400	Assuming an average sample of 300 children per

					State and an average time of 4 hours ⁴ (including multiple attempts) to locate, travel to, and conduct a ½ hour re-interview with each child's parent/guardian.
		300 parents ⁵ of migratory children per State = 600 parents	0.5	300	
Analysis & Reporting (<i>record-keeping and reporting</i>)	One Time	2 SEAs	380	760	Assuming an average sample of 300 children and 1 hour per child to analyze findings and 80 hours to construct the report.
Total	One Time	2 SEAs	1,580	3,160	
		600 parents	0.5	300	
				3,460	

§200.89(b)(2): Prospective Re-Interviewing	Frequency of response	# of Respondents	# of Hours per respondent	Total Hours	Description
Re-interviews (<i>record-keeping</i>)	Annually	46 SEAs	100	4,600	Assuming an average sample of 50 children per State and an average time of 2 hours ⁶
		50 parents of migratory children per State (46) = 2,300 parents	0.50	1,150	(including multiple attempts) to locate, travel to, and conduct a ½ hour re-interview with each

⁴ We estimate 4 hours to locate/re-interview each child retrospectively since these re-interviews will be taking place up to four years after the initial eligibility determination was done.

⁵ Assumes only 1 parent/guardian per family needs be interviewed.

⁶ We estimate 2 hours to locate/re-interview each child prospectively since these re-interviews will take place soon after the initial eligibility determination was done in any program year.

					child's parent/guardian.
Analysis (<i>record-keeping</i>)	Annually	46 SEAs	50	2,300	Assuming an average sample of 50 children per State and 1 hour per child to analyze findings.
Report as part of Consolidated State Performance Report ⁷ (<i>reporting</i>)	Annually	46 SEAs	2	92	Assuming 2 hours per State to summarize the new findings for the report.
Total		46 SEAs	152	6,992	
		2,300 parents	0.5	1,150	
				8,142	

200.89(c)	Frequency of response	# of Respondents	Average # of Hours per respondent	Total Hours	Description
Eligibility Documentation					
Conduct the interview (<i>record-keeping</i>)	Once per 3-years of eligibility	46 SEAs	3,965.22	182,400	Assuming approximately 304,000 children in the 46 SEA operated States and 2.5 children per family (and per COE) and 1.5 hours to initially locate, travel to, and conduct a ½ hour interview with each family.
		121,600 parents ⁸	0.5	60,800	

⁷ The Consolidated State Performance Report has already been cleared through 10/31/2022 under OMB No. 1810-0724.

⁸ Assumes 1 parent per family needs to be interviewed.

Write up the COE & other SEA-required eligibility documentation (<i>record-keeping</i>)	Once per 3-years of eligibility	46 SEAS	660.87	30,400	Assuming 15 minutes per COE. One COE is completed for every family (each with an average of 2.5 children).
Update/Revise COE as necessary (<i>record-keeping</i>)	Twice within 3-year eligibility period	46 SEAs	2,643.48	121,600	Assuming an average of ½ hour per COE per year for each of two of three years.
		121,600 parents	1.0	121,600	
TOTAL for §200.89(c)		46 SEAs	7,269.57	334,400	
		121,600 parents	1.5	182,400	
				516,800	

200.89(d): Quality Control Procedures	Frequency of response	# of Respondents	Average # of Hours per respondent	Total Hours	Description
SEA/LEA COE reviews (<i>record-keeping</i>)	Annually	46 SEAs	440.58	20,266.68	Assuming 121,600 COEs (new or updated) and 10 minutes per COE for review.
Documentation of quality control processes and improvement (<i>record-keeping</i>)	Annually	46 SEAs	200	9,200	Assumes 200 hours to prepare needed documentation
TOTAL for §200.89(d)		46 SEAs	640.58	29,467	

Exhibit 2. Estimated costs

IC Type	Respondent	Average Burden Hours per Response	Hourly Rate	Average Total Cost Per Response	# of Responses	Total Annual Costs
Needs assessment and State plan for service delivery (34 CFR § 200.83)	SEA	1,043.5	\$25	\$26,088	46	\$300,012
Evaluation (34 CFR § 200.84)	SEA	440	\$25	\$11,000	46	\$126,500
Written determinations re: supplemental State and local funds (34 CFR § 200.88)	SEA	4	\$25	\$100	46	\$1,150
Retrospective re-interviewing (34 CFR §200.89(b)(1))	SEA	1,200	\$10	\$12,000	2	\$8,000
		380	\$25	\$9,500	2	\$6,334
Prospective re-interviewing (34 CFR §200.89(b)(2))	SEA	100	\$10	\$1,000	46	\$46,000
		52	\$25	\$1,300	46	\$59,800
Eligibility determinations (34 CFR §200.89(c))	SEA	7,269.57	\$10	\$72,695.70	46	\$1,114,667
34 CFR §200.89(d)	SEA	640.58	\$25	\$16,014.50	46	\$736,667

We estimate an average of \$25/hour for SEA staff carrying out analysis and reporting in 34 CFR §§200.83, 200.84, 200.88, and 200.89(d), and \$10/hour for SEA staff carrying out interviews in 34 CFR §§200.89(b) and 200.89(c).

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:

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 consist of staff time to monitor SEAs.

Estimated Annualized Federal Cost of Department Monitoring

In regard to staff time for monitoring SEAs, Department staff could be expected to spend two hours reviewing an SEA’s needs assessment and service delivery plan (34 CFR § 200.83); two hours reviewing a SEA's program evaluation (34 CFR § 200.84); one-half hour reviewing SEA's written determinations supporting the exclusion of State or local funds from "comparability" and "supplement, not supplant" provisions of the statute in preparation for program monitoring (34 CFR § 200.88); four hours reviewing an SEA’s retrospective re-interviewing documentation (34 CFR § 200.89(b)(1)); two hours reviewing an SEA’s prospective re-interviewing documentation (34 CFR § 200.89(b)(2)); five hours reviewing an SEA’s COEs (34 CFR §200.89(c)); and two hours reviewing an SEA’s Quality Control system and documentation (34 CFR § 200.89(d).

§ 200.83 Activities						
Number of Needs Assessments & Service Delivery Plans	Review Time	Total Review Time	Wage Rate for Personnel	Total Personnel Cost	Other Costs	Total Cost of Review
16 SEAs	2 hours	32 hours	\$52	\$1,664	0.00	\$1,664

§ 200.84 Activities						
Number of Program Evaluations	Review Time	Total Review Time	Wage Rate for Personnel	Total Personnel Cost	Other Costs	Total Cost of Review
16 SEAs	2 hours	32 hours	\$52	\$1,664	0.00	\$1,664

§ 200.88 Activities						
Number of Program Exclusions	Review Time	Total Review Time	Wage Rate for Personnel	Total Personnel Cost	Other Costs	Total Cost of Review
16 SEAs	.5 hours	8 hours	\$52	\$416	0.00	\$416

§ 200.89(b) Activities						
Re-interviewing documentation	Review Time	Total Review Time	Wage Rate for Personnel⁹	Total Personnel Cost	Other Costs	Total Cost of Review

16 SEAs ¹⁰	6 hours	96 hours	\$52	\$4,992	0.00	\$4,992
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§ 200.89(c) Activities						
Eligibility documentation	Review Time	Total Review Time	Wage Rate for Personnel	Total Personnel Cost	Other Costs	Total Cost of Review
16 SEAs	5 hours	80 hours	\$52	\$4,160	0.00	\$4,160

§ 200.89(d) Activities						
Quality Control Documentation	Review Time	Total Review Time	Wage Rate for Personnel	Total Personnel Cost	Other Costs	Total Cost of Review
16 SEAs	2 hours	32 hours	\$52	\$1,664	0.00	\$1,664

The total annual cost to the Federal Government for Department monitoring of SEAs is \$14,560.

- 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).**

The total burden hours decreased from 564,400 to 228,135, primarily due to correcting a technical error made during the 2017 review of this information collection. In addition, a decrease in the number of eligible migratory children, from approximately 332,000 to 304,000 nationally resulted in a reduction to the burden and costs associated with documenting program eligibility (34 CFR §200.89(c)) and quality control associated with SEA review of eligibility documentation (34 CFR §200.89(d)) totaling 17,732 hours and \$370,466 annually. The total annual burden hours for 34 CFR §200.89(c) were reduced from 188,133 to 172,267 and the total annual costs for SEAs were reduced from \$1,438,650 to \$1,114,667— a reduction of 15,866 hours and \$323,983. The total annual burden hours for 34 CFR §200.89(d) were reduced from 31,333 to 29,467 and the total annual costs for SEAs were reduced from \$783,150 to \$736,667— a reduction of 1,866 hours and \$46,483. The adjustment due to the correction of the technical error is a decrease of 318,533 burden hours and the adjustment due to a decrease in the number of migratory children is a decrease of 17,732 burden hours, making for a total downward adjustment of 336,265 burden hours.

⁹ FY 2019 pay rate for a GS-12/10

¹⁰ 16 SEAs reflects an annualized figure – over 3-years -- of the 46 SEAs to be reviewed

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 (except for 34 CFR § 200.89(b)) or use of complex analytical techniques. The defect rates reported under 34 CFR § 200.89(b)(1) will be reported by the Secretary in tabular form to the States, Congress and the public.

The information collection is ongoing, and necessary for each SEA to design, implement, and improve its Statewide MEP.

The following requirements need to be implemented at least once during the current period of authorization for ESEA: needs assessment and service delivery plan under § 200.83, program evaluation under 34 CFR § 200.84, and the SEA's advance written determination that a State or locally funded program meets the intent and purposes of part C of Title I under 34 CFR § 200.88.

The retrospective re-interviewing process required under 34 CFR § 200.89(b)(1), which has already been done by SEAs, had to be implemented once during the previous period of authorization of ESEA. The prospective re-interviewing process under 34 CFR § 200.80(b)(2) must be implemented annually. Identification of eligible migratory children and documentation of eligibility status under 34 CFR § 200.89(c) is an activity carried out on an ongoing basis. SEAs must implement the quality control processes required under 34 CFR § 200.89(d) throughout the period of authorization of ESEA.

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 Department is not seeking this approval.

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

Exception (i) in Item 20 – Statistical survey methodology does not apply. There are no proposed exceptions to the certifications.