

LEAs that obtain poverty counts through consultation process

For LEAs that do not already have enrollment data for one or more participating non-public schools and that cannot obtain such data from the SEA, complying with the interim final rule entails obtaining the data directly from those schools through the consultation process. The Department believes this will be minimally burdensome on these LEAs, which we estimate to include 20 percent of affected LEAs. Specifically, we estimate that an LEA will have on average two non-public schools for which enrollment data are needed and that it will take on average 0.5 total hours to obtain the data from those schools. At \$35 per hour for LEA staff, the average cost is an estimated \$18 per LEA. Assuming that 10,125 LEAs (or 75 percent of an estimated 13,500 LEAs with attendance areas) are subject to the equitable services provisions of the CARES Act and that 7,595 (or 75 percent) of these LEAs will choose to serve students and teachers in both Title I and non-Title I schools, approximately 1,520 LEAs (20 percent of 7,595 affected LEAs) would bear this cost, for a total estimated cost of \$27,360 and 760 burden hours.

LEAs that obtain poverty counts from non-public schools to implement the proportionality method

LEAs have the option to determine the proportional share for equitable services using data on the number of students from low-income families who attend participating Title I schools and participating non-public elementary and secondary schools in the LEA. Under this alternative, an LEA may choose to obtain poverty counts for students in non-public schools that wish to participate. We estimate that 12.5 percent of affected LEAs will implement this alternative by obtaining poverty counts and that it will take an LEA on average 240 hours to obtain those counts. At \$35 per hour for LEA staff, the average cost is an estimated \$8,400 per LEA. Assuming that 2,530 LEAs (or 25 percent of the estimated 10,125 LEAs subject to the equitable services provisions of the CARES Act) will choose to serve students and teachers in Title I schools only, approximately 315 LEAs (12.5 percent of 2,530 affected LEAs) would bear this cost, for a total estimated cost of \$2,646,000 and 75,600 burden hours.

LEAs that obtain enrollment data of non-public schools to implement proportionality method

LEAs may also implement this poverty alternative using a proportionality method, wherein the LEA applies the average poverty rate of its Title I schools to the enrollment in non-public schools that will participate in a CARES Act program to generate poverty estimates for those schools. LEAs that choose to implement this alternative using a proportionality method would accordingly need to have enrollment data from participating non-public schools, but not poverty data--that is, the same enrollment data required of LEAs serving students and teachers in both Title I and non-Title I schools to determine the proportional share. With respect to those LEAs, enrollment data are generally already available. We estimate that only 20 percent of affected LEAs would need to obtain those data from one or more participating non-public schools, and that it would take on average 0.5 hours to obtain the data. At \$35 per hour for LEA staff, the average cost is an estimated \$18 per LEA. Assuming that 315 LEAs (or 12.5 percent of the estimated 2,530 LEAs that will choose to serve students and teachers in Title I

schools only) will choose to implement this poverty alternative using a proportionality method or, as permitted, use enrollment data to determine the proportional share, approximately 65 LEAs (20 percent of 315 affected LEAs) would bear this cost, for a total estimated cost of \$1,170 and 32.5 burden hours.

Estimated Annual Burden and Respondent Costs Table

LEA Activity/ Requirements	# of Respondents	# of Responses	Hours/ Response	Burden hours (annualized)	Costs @\$35 per hour
LEAs that obtain poverty counts through consultation process	1,520 LEAs	1,520	0.5	760	\$27,360
LEAs that obtain poverty counts from non-public schools to implement the proportionality method	315 LEAs	315	240	75,600	\$2,646,000
LEAs that obtain enrollment data of non-public schools to implement proportionality method	65 LEAs	65	0.5	32.5	\$1,170
TOTAL	1,900 LEAs	1,900		76,392.5 hours	\$2,685,120