

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION

- 1. Explain the circumstances that make the collection of information necessary. What is the purpose for this information collection? Identify any legal or administrative requirements that necessitate the collection. Include a citation that authorizes the collection of information. 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, list the sections with a brief description of the information collection requirement, and/or changes to sections, if applicable.**

The Impact Aid Program (IAP) in the Office of Elementary and Secondary Education (OESE) at the U.S. Department of Education (ED) requests an extension without change of the U.S. Office of Management and Budget (OMB) collection 1810-0764 for the Electronic Data Collection (EDC) Program Questionnaire.

Local educational agencies (LEAs) are required to annually submit federally connected student count data with the grant application for Section 7003 Payments for Federally Connected Children. Traditionally, LEAs have used paper survey forms to collect this information. However, the IAP has allowed LEAs to demonstrate that they can successfully collect this information electronically through student information systems (SIS). IAP has created a questionnaire to help LEAs and IAP determine if the electronic data collection can meet the statutory and regulatory requirements to successfully count their federally connected student counts.

- 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.**

LEAs use the Electronic Data Collection (EDC) Program Questionnaire to begin the approval process for the EDC. IAP uses the form to assess the readiness of the LEA's SIS to conduct an electronic survey. IAP uses the questionnaire to generate LEA specific technical assistance tailored to that LEA and their unique circumstances.

The purpose of the EDC is to reduce administrative burden and cost associated with the man hours required to create, send, collect, and collate the paper forms that are the basis of the federally connected student counts. Additionally, IAP uses the experiences of the LEAs that choose to use this method to create a set of best practices to assist other LEAs developing their own EDC systems.

The IAP questionnaire is used to provide LEAs with technical assistance to ensure the success of the new EDCs. IAP has learned that EDCs increase efficiency and reduce costs associated with the Impact Aid data collection process. IAP has developed a set of best practices and potential challenges to assist LEAs beginning the EDC process.

EDC participants must successfully demonstrate their system complies with all requirements of the Impact Aid program: 34 CFR 222.33, 34 CFR 222.35, and 34 CFR.52, as well as federal guidelines regarding electronic signatures. Once an LEA has demonstrated a successful EDC, they are permitted to use this method for future applications.

To date, IAP has been able to approve more than 75 out of approximately 1,000 eligible LEAs to collect their federally connected student count using their SIS. There are 25 more LEAs currently in the process of being approved. By FY 2026, we fully expect to have 15% of our total LEAs approved to use the EDC.

- 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. Please identify systems or websites used to electronically collect this information. Also describe any consideration given to using technology to reduce burden. If there is an increase or decrease in burden related to using technology (e.g., using an electronic form, system, or website from paper), please explain in number 12.**

An interested LEA will submit the EDC questionnaire using Microsoft Forms. When a form is submitted, an email alert will be sent to the EDC inbox EDCPilot@ed.gov through a Microsoft Workflow. This manner of communication will ensure a timely response to LEA queries and assist Impact Aid staff in scheduling technical assistance as needed.

- 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 is a unique collection; there are no other data collections which seek this information.

- 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.**

This information collection requirement does not impact small entities.

- 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 questionnaire improves the accuracy and efficiency with which the data is collected. Previously, information was manually entered and tracked.

- 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.**

No such circumstances exist.

- 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.**

Include a citation for the 60-day comment period (e.g., Vol. 84 FR ##### and the date of publication). Summarize public comments received in response to the 60-day notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. If only non-substantive comments are provided, please provide a statement to that effect and that it did not relate or warrant any changes to this information collection request. In your comments, please also indicate the number of public comments received.

For the 30-day notice, indicate that a notice will be published.

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.

ED has consulted with the major external stakeholders and LEAs on the use of this collection and its impact on their grant applications. We have received overwhelmingly positive responses from outside ED.

On June 17, 2024, a Federal Register Notice requesting public comment was published (Vol. 89, No. 117, page 51320). During the 60-day comment period, no comments were received.

The Department will publish 30-day Federal Register notices as required by 5 CFR 1320.8(d), soliciting comments on the information collection.

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

No payments or gifts to respondents will be provided. Any costs associated with implementing an EDC are the sole responsibility of the LEA.

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.¹ If the collection is subject to the Privacy Act,

¹ 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

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. If no PII will be collected, state that no assurance of confidentiality is provided to respondents. If the Paperwork Burden Statement is not included physically on a form, you may include it here. Please ensure that your response per respondent matches the estimate provided in number 12.

The questionnaire contains no collection of PII. Additionally, there is no expectation or pledge of confidentiality of the data collected.

- 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.**

Information of a sensitive nature is not requested.

- 12. Provide estimates of the hour burden for this current information collection request. The statement should:**

- Provide an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third-party disclosure. Address changes in burden due to the use of technology (if applicable). Generally, estimates should not include burden hours for customary and usual business practices.**
- Please do not include increases in burden and respondents numerically in this table. Explain these changes in number 15.**
- 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. 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 this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burden in the table below.**

- **Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. [Use this site](#) to research the appropriate wage rate. 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. If there is no cost to respondents, indicate by entering 0 in the chart below and/or provide a statement.**

Provide a descriptive narrative here in addition to completing the table below with burden hour estimates.

The questionnaire can be addressed by one information collection. The estimated burden includes only the time required to complete the questionnaire. As the questionnaire does contain some technical knowledge, the cost determination is based on 15 minutes of a database administrator. According to the Bureau of Labor Statistics, the median hourly wage of a database administrator is \$56.46 per hour. IAP receives approximately 30 questionnaires per year. Assuming it takes 15 minutes to complete the questionnaire, the collection yields an annual total of 8 hours. At a rate of \$56.46 per hour, the total cost for the questionnaire in any given year is estimated at \$451.68.

Estimated Annual Burden and Respondent Costs Table

Information Activity or IC (with type of respondent)	Number of Respondents	Number of Responses	Average Burden Hours per Response	Total Annual Burden Hours	Estimated Respondent Average Hourly Wage	Total Annual Costs (hourly wage x total burden hours)
EDC Questionnaire LEAs	30	30	.25	7.5	\$56.46	\$451.68
Yearly Totals	30	30	.25	7.5	\$56.46	\$451.68

Please ensure the annual total burden, respondents, and response match those entered in IC Data Parts 1 and 2, and the response per respondent matches the Paperwork Burden Statement that must be included on all forms.

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 consider 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	: \$0.00
Total Annual Costs (O&M)	: \$0.00
Total Annualized Costs Requested	: \$0.00

The total for the capital and start-up cost components for this information collection is zero. The information collection will not require the purchase of any capital equipment nor create any start-up costs. Computers and software used to complete this information collection are part of the respondents' customary and usual business or private practices, and therefore is not included in this estimate. The total operation and maintenance and purchase of service components for this collection is zero. The information collection will not create costs associated with generating, maintaining, and disclosing or providing the information that is not already identified in question 12 of this supporting statement.

- 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.**

As indicated in the table below, the estimated annualized cost to the Federal government is \$480.00. This includes the salaries of the employees who will review the submissions.

Year	Number of Employees	Employee Grade	Estimated Number of Hours Per Employee	Total Number of Estimated Hours	Estimated Hourly Cost	Total Annualized Costs
2024	2	13	2	4	\$65.00	\$260.00
2024	2	12	2	4	\$55.00	\$220.00
2024 Total	4		2	8		\$480.00

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).

Provide a descriptive narrative for the reasons of any change in addition to completing the table with the burden hour change(s) here.

There are no changes to the burden hours.

	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate
Total Burden			
Total Responses			
Total Costs (if applicable)			

- 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.**

N/A

- 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.**

N/A

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

N/A