

Tracking and OMB Number: 1810-0662

Revised: 08/31/2023

**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 U.S. Department of Education (the Department) is requesting a revision to the currently approved information collection OMB No. 1810-0662. The revision is to remove one unnecessary data element on the National Certificate of Eligibility (COE). This collection is necessary to collect information under the Title I, Part C program, authorized under sections

1301-1309 of the Elementary and Secondary Education Act of 1965, as amended (ESEA). Regulations for Title I, Part C 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 Title I, Part C program. 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 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 an 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

440 record-keeping hours includes 120 hours for data collection and 320 hours for data analysis and summary.

34 CFR §§ 200.88 is a one-time requirement per ESEA authorization, so burden hours are annualized over a four-year period.

Four record-keeping hours consists of analysis and preparation of a written determination.

34 CFR § 200.89(b)(1) is a one-time requirement over a three-year period, so burden hours are annualized over a three-year period.

Estimates are based on an average sample of 300 children per State and an average time of 4 hours for each re-interview (including multiple attempts to locate, travel to, and conduct a ½ hour re-interview with each child's parent/guardian).

Staff are estimated to spend one hour to analyze findings for each of the 300 children and a total of 80 hours to construct the report.

175 record-keeping hours assumes an average sample of 50 children per State and an average time of 3.5 hours for each re-interview (including multiple attempts to locate, travel to, and conduct a ½ hour re-interview with each child's parent/guardian).

Staff are estimated to spend one hour to analyze findings for each of the 50 children and a total of four hours to summarize findings for report.

34 CFR § 200.89(c) is a one-time requirement over a three-year period, so burden hours are annualized over a three-year period.

Note that total number of respondents 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 respondents.

Note that total number of burden hours per migratory parent does not equal the sum of the figures in the "Average Burden Hours per Response" column because a migratory parent would only respond to 34 CFR § 200.89(b)(1) or 34 CFR § 200.89(b)(2) each year, not both requirements.

FY 2026 General Schedule Base hourly pay for a GS-12/10

15 SEAs reflects an annualized figure – over 3-years -- of the 45 SEAs to be reviewed

the program evaluation required under section 1304(c)(5) of the ESEA.

- 34 CFR § 200.88 clarifies for the purposes of Title I, Part C, only "supplemental" State or local funds that are used for programs that meet the intent and purposes of Title I, Part C may be excluded in terms of determining compliance with the "comparability" and "supplement, not supplant" provisions of the statute (section 1118 of the ESEA).
- 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 Title I, Part C 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 Title I, Part C (including the use of a standard 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 Title I, Part C. This regulatory requirement is consistent with sections 1303(e) and 1309(2)-(5) of the ESEA.

The relevant [statute](#) and [regulations](#) are linked. 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 Title I, Part C program. The evaluation information required by 34 CFR § 200.84 is used by the SEA to assess the effectiveness of the program 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 re-interview information may also be used by the Secretary to make necessary adjustments to State Title I, Part C 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 Title I, Part C-funded 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 Title I, Part C program.

- 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.**

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 Title I, Part C program.

- 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 Title I, Part C 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 Title I, Part C program 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.**

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.

Program staff consult with grantees regarding these information collection requirements on an ongoing basis, through technical assistance, monitoring, and during meetings with Title I, Part C State Directors and other stakeholders. Topics discussed include: the requirements for, and frequency of data collection, and availability 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)); as well as the processes and procedures used to sustain or improve quality control of eligibility determinations (34 CFR § 200.89(d)), including those for conducting re-interviews (34 CFR § 200.89(b)(2)).

The Department will publish a 60-day Federal Register Notice, 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.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. 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 specific Title I, Part C 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 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**

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)

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.

Estimated Annual Burden and Respondent Costs Table

¹ 34 CFR §§ 200.83 is a one-time requirement per ESEA authorization, so burden hours are annualized over a four-year period.

Information Activity or IC (with type of respondent)	Sample Size (if applicable)	Respondent Response Rate (if applicable)	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)
Needs assessment and State plan for service delivery (34 CFR § 200.83) ¹	N/A	N/A	45 SEAs	45	1,083.5	12,189	\$26	\$316,914
Evaluation (34 CFR § 200.84)	N/A	N/A	45 SEAs	45	440	4,950	\$26	\$128,700
Written determinations re: supplemental State and local funds (34 CFR § 200.88)	N/A	N/A	45 SEAs	45	4	45	\$26	\$1,170
Retrospective re-interviewing	N/A	N/A	1 SEAs	1	1,200	400	\$15	\$9,302
					380	127	\$26	

Information Activity or IC (with type of respondent)	Sample Size (if applicable)	Respondent Response Rate (if applicable)	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)
(34 CFR §200.89(b)(1))	N/A	N/A	300 Parents/guardians	300	0.5	50	\$0	\$0
Prospective re-interviewing (34 CFR §200.89(b)(2))	N/A	N/A	45 SEAs	45	175	7,875	\$15	\$181,305
					54	2,430	\$26	
	N/A	N/A	2,250 Parents/guardians	2,250	0.5	1,125	\$0	\$0
Eligibility determinations (34 CFR §200.89(c))	N/A	N/A	45 SEAs	45	9,252	138,780	\$15	\$2,081,700
	N/A	N/A	113,495 Parents/guardians	113,495	2	75,663	\$0	\$0
Quality control procedures (34 CFR §200.89(d))	N/A	N/A	45 SEAs	45	1,443	64,935	\$26	\$1,688,310
Annualized Totals	-	-	113,540	116,316	-	308,569	-	\$4,407,401

We estimate that it will require 14,032 hours per SEA respondent and 2.5³ hours per migratory parent to respond to the requirements of these regulations.

We estimate that a total of 45 SEAs will be subject to these requirements because the SEAs for Rhode Island, Connecticut, West Virginia, Wyoming, New Hampshire, the District of Columbia, and Puerto Rico no longer participate in the Title I, Part C program. 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 only one SEA has been required to conduct retrospective re-interviews since 2020, we estimate this requirement will apply to no more than 1 SEA 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.

We estimate an average of \$26/hour for SEA staff carrying out analysis and reporting in 34 CFR §§ 200.83, 200.84, 200.88, and 200.89(d), and \$15/hour for SEA staff carrying out interviews in 34 CFR §§ 200.89(c). We estimate an average of \$26/hour and \$15/hour for SEA staff carrying out interviews in 34 CFR §§ 200.89(b).

³ 34 CFR §§ 200.83 is a one-time requirement per ESEA authorization, so burden hours are annualized over a four-year period.

These estimates were developed by program staff in consultation with State-level Title I, Part C Directors representing nine U.S. regions.

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
15 SEAs	2 hours	30 hours	\$48	\$1,440	0.00	\$1,440

§ 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
15 SEAs	2 hours	30 hours	\$48	\$1,440	0.00	\$1,440

§ 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
15 SEAs	.5 hours	7.5 hours	\$48	\$360	0.00	\$360

§ 200.89(b) Activities						
Re-interviewing documentation	Review Time	Total Review Time	Wage Rate for Personnel⁴	Total Personnel Cost	Other Costs	Total Cost of Review
15 SEAs ⁵	6 hours	90 hours	\$48	\$4,320	0.00	\$4,320

⁴ 1,083.5 total record-keeping hours includes 603.50 hours for data collection, 160 hours for data analysis and summary, 200 hours for plan drafting and revision, and 120 hours for updates based on evaluation results.

§ 200.89(c) Activities						
Eligibility documentation	Review Time	Total Review Time	Wage Rate for Personnel	Total Personnel Cost	Other Costs	Total Cost of Review
15 SEAs	5 hours	75 hours	\$48	\$3,600	0.00	\$3,600

§ 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
15 SEAs	2 hours	30 hours	\$48	\$1,440	0.00	\$1,440

The total annual cost to the Federal Government for Department monitoring of SEAs is \$12,600.

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 were program adjustments. The total annual burden hours increased from 301,570 to 308,569, primarily due to a 4.7% increase in the unduplicated statewide count of eligible migratory children between Performance Periods 2020-21 and 2023-24. The number of eligible migratory children increased from approximately 271,000 to 284,000 nationally.

Based on the U.S. Bureau of Labor Statistics Occupational Employment and Wage Statistics tables, the estimated average wage for SEA staff carrying out analysis and reporting in 34 CFR §§ 200.83, 200.84, 200.88, and 200.89(d), and carrying out interviews in 34 CFR §§ 200.89(b), increased from \$25 to \$26. The estimated average wage for SEA staff carrying out interviews in 34 CFR §§ 200.89(c) and 200.89(b) increased from \$10 to \$15. Burden estimates were partially offset by a decrease in the number of SEA respondents from 46 to 45, and the decrease in the number of respondents for 34 CFR § 200.89(b)(1).

⁵ 34 CFR §§ 200.84 is a one-time requirement per ESEA authorization, so burden hours are annualized over a four-year period.

The total annual burden hours for 34 CFR § 200.83 were decreased from 12,460 to 12,189 and the total annual costs for SEAs were increased from \$311,506 to \$316,914 – a decrease of 271 hours and an increase of \$5,408. The total annual burden hours for 34 CFR § 200.84 were decreased from 5,060 to 4,950 and the total annual costs for SEAs were increased from \$126,500 to \$ 128,700 – a decrease of 110 hours and increase of \$2,200. The total annual burden hours for 34 CFR § 200.88 were decreased from 46 to 45 and the total annual costs for SEAs were increased from \$1,150 to \$1,170 – a decrease of 1 hour and increase of \$20. The total annual burden hours for 34 CFR §200.89(b)(1) were decreased from 1,153 to 577 and the total annual costs for SEAs were decreased from \$14,334 to \$9,302 – a decrease of 576 hours and \$5,032. The total annual burden hours for 34 CFR § 200.89(b)(2) were decreased from 11,684 to 11,430 and the total annual costs for SEAs were increased from \$142,600 to \$181,305 – an decrease of 254 hours and increase of \$38,705. The total annual burden hours for 34 CFR §200.89(c) were increased from 207,767 to 214,443 and the total annual costs for SEAs were increased from \$1,354,999 to \$2,081,700— an increase of 6,676 hours and \$726,701. The total annual burden hours for 34 CFR § 200.89(d) were increased from 63,400 to 64,935 and the total annual costs for SEAs were increased from \$1,584,999 to \$1,688,310— an increase of 1,535 hours and \$103,311.

The total upward adjustment is 6,999 burden hours.

	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate
Total Burden			6,999 hours increase
Total Responses			4,738 increase
Total Costs (if applicable)			\$871,311 increase

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 information collection is ongoing, and necessary for each SEA to design, implement, and improve its Statewide Title I, Part C program.

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.