

Head Start/Early Head Start Emergency Preparedness Survey

Supporting Statement Part A

May 2009

Justification

A1. Circumstances Making the Collection of Information Necessary

The Administration for Children and Families (ACF) in the U.S. Department of Health and Human Services (HHS) seeks approval for data collection related to a survey of Head Start and Early Head Start grantees' emergency preparedness. The survey, Head Start/Early Head Start Emergency Preparedness Survey, will ultimately produce data on program emergency preparedness for reporting to Congress as required by Public Law 110-134 "Improving Head Start for School Readiness Act of 2007", Sec.649(m). Congress required in Sec.649 (m) Program Emergency Preparedness, that:

"The Secretary shall evaluate the Federal, State, and local preparedness of Head Start programs, including Early Head Start programs, to respond appropriately in the event of a large-scale emergency, such as the hurricanes Katrina, Rita, and Wilma, the terrorist attacks of September 11, 2001, or other incidents where assistance may be warranted under the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5121 et seq.)."

Further, the Section 649(m) requires a report to Congress as stated below:

"(3) REPORT TO CONGRESS- Not later than 18 months after the date of the enactment of the Improving Head Start for School Readiness Act of 2007, the Secretary shall prepare and submit to Committee on Education and Labor of the House of Representatives and the Committee on Health, Education, Labor, and Pensions of the Senate a report containing the results of the evaluation required under paragraph (2), including--

(A) recommendations for improvements to Federal, State, and local preparedness and response capabilities to large-scale emergencies, including those that were developed in response to hurricanes Katrina, Rita, and Wilma, as they relate to Head Start programs, including Early Head Start programs, and the Secretary's plan to implement such recommendations;

(B) an evaluation of the procedures for informing families of children in Head Start programs about the program protocols for response to a large-scale emergency, including procedures for communicating with such families in the event of a large-scale emergency;

(C) an evaluation of such procedures for staff training on State and local evacuation and emergency protocols; and

(D) an evaluation of procedures for Head Start agencies and the Secretary to coordinate with appropriate Federal, State, and local emergency management agencies in the event of a large scale emergency and recommendations to improve such procedures."

There is currently no uniform information collected on how Head Start programs have or have not developed policies and procedures for such a situation. Such information is crucial to the Office of Head Start in responding to the Congressional requirements in the 2007 Act.

Study Objectives

In response to the legislative mandate, the overall objective of the Head Start/Early Head Start Emergency Preparedness Survey is to obtain an overview of:

- How Head Start programs have determined the need for emergency preparedness and response planning for large-scale emergencies,
- The policies and procedures developed by programs for emergency preparedness and response, and
- How such policies and procedures are operationalized within the program.

To meet this objective the Head Start/Early Head Start Emergency Preparedness Survey will ask all Head Start grantees about the following:

- Presence of a large-scale emergency plan, and types of emergencies included (Section A of the survey)
- Tests and drills for grantees' emergency preparedness plans, policies and procedures (Section B of the survey)
- Communication of emergency preparedness plans, policies and procedures for staff, parents, and others (Section C of the survey)
- Financial support of emergency preparedness plans (Section D of the survey)
- Connecting grantees' program with State and local (jurisdictions) evacuation and emergency protocols (Section E of the survey)
- Coordination with emergency management agencies and organizations (Section F of the survey)
- Preparing for response and recovery from large-scale emergencies (Section G of the survey)
- Emergency preparedness and response planning for localized emergencies (Section H of the survey)

It is essential that this survey accurately represent Head Start/Early Head Start program's emergency preparedness and response activities.

The Office of Head Start understands that programs are in various stages of planning and preparing for large-scale emergencies. The survey will also capture this variation so that OHS can better plan for technical assistance and guidance.

A2. Purpose and Use of the Information Collection

The Head Start/Early Head Start Emergency Preparedness Survey and resulting data will assist the Office of Head Start in meeting the Congressional requirements in Public Law 110-134 "Improving Head Start for School Readiness Act of 2007" (as discussed in A1). Currently there is no uniform information collected on how Head Start programs have or have not developed policies and procedures for such a situation. This data will be analyzed and provided to Congress in a report that details the ability of Head Start/Early Head Start grantees to respond to large-

scale emergencies. The information also will be used by the Office of Head Start to plan and refine technical assistance activities as needed.

A3. Use of Improved Information Technology and Burden Reduction

Data will be collected using the Head Start Enterprise System. The Head Start Enterprise System (HSES) is an interactive web-based application that is used for data collection, consolidation, business process management and management reporting. The Office of Head Start uses HSES as the primary interactive repository for data that informs the effective management and oversight of Head Start grants. Each Head Start/Early Head Start grantee has access to this system, and grantees and their delegates are familiar with the system. The use of this system will allow for uniform collection across grantees as well as tracking responses.

A4. Efforts to Identify Duplication and Use of Similar Information

The Administration for Children and Families has reviewed existing data collection efforts in Head Start/Early Head Start including the Program Information Report and Monitoring Reviews. Currently there is no existing data source that addresses the elements of emergency preparedness and response planning of Head Start/Early Head Start grantees for large-scale emergencies.

A5. Impact on Small Businesses or Other Small Entities

Not applicable. No small businesses are expected to be involved.

A6. Consequences of Collecting Information Less Frequently

This is a one time collection.

A7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

There are no special circumstances for the proposed data collection.

A8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-12) and Office of Management and Budget (OMB) regulations 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection activity. This notice was published in the *Federal Register*, Volume 74, Page 10919 on March 13, 2009, and provided a 60 day period for public comment. A copy of this notice is attached as Appendix A.

During the notice and comment period, the government received six requests for copies of the instrument. All requests were fulfilled and no public comments were received.

The second *Federal Register* notice was published in the *Federal Register*, Volume 74, Page 22747 on May 14, 2009. A copy of the 30-day notice is included in Appendix B.

There was no consultation outside of the Administration for Children and Families on the design of the Head Start/Early Head Start Emergency Preparedness Survey.

A9. Explanation of Any Payment or Gift to Respondents

No payments to respondents are proposed for this information collection.

A10. Assurance of Confidentiality Provided to Respondents

The privacy of the grantees will be ensured to the fullest extent of the law. The information collection does not include sensitive questions. All grantees completing the survey will be assured that the information provided will not be used to evaluate their standing as grantees, and will not be released in a form that identifies them.

A11. Justification for Sensitive Questions

There are no personally sensitive questions in this data collection.

A12. Estimates of Annualized Burden Hours and Costs

Respondents will not incur any expenses other than the time spent answering the questions contained in the Head Start/Early Head Start Emergency Preparedness Survey.

Exhibit 1 summarizes reporting burden on respondents to the Head Start/Early Head Start Emergency Preparedness Survey submitted for OMB clearance. Response times were estimated from pre-tests with eight Head Start fellows who are Head Start program administrative staff in their respective Head Start programs. The annual burden is estimated from the average total minutes taken to complete the survey. Thus, the total burden is expected to be 850 hours.

Exhibit 1: Burden and Cost of Survey

Instrument	Annual Number of Respondents	Number of Responses Per Respondent	Average Burden Hours Per Response	Total Annual Burden Hours	Average Hourly Wage	Total Annual Cost
Head Start/Early Head Start Emergency Preparedness Survey	1604	1	0.50	802	\$35	\$28,070
Head Start/Early Head Start Emergency Preparedness Survey Informational Material	1604	1	0.03	48	\$35	\$1,680
Estimated Totals:				850		\$29,750

Survey respondents will be Head Start and Early Head Start grantees, with the Program Director completing the survey. To compute the total estimated annual cost, the total burden hours were multiplied by the average hourly wage. The average hourly wage was derived from the annual

salary information of directors in the Program Information Report divided by an estimated number of hours the typical director would work.

A13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

Not applicable. The Head Start/Early Head Start Emergency Preparedness Survey information collection activities do not place any capital cost or cost of maintaining capital requirements on respondents.

A14. Annualized Cost to the Federal Government

The information collection activity and associated survey have been created by staff from the Administration for Children and Families. The estimated costs are calculated by multiplying the average hourly wage, \$58.49, by the number of hours spent, 260, creating the Head Start/Early Head Start Emergency Preparedness Survey and the OMB package for a total cost of \$15,207.90.

The costs for preparing the survey for posting on the Head Start Enterprise System (HSES) will be 40 hours of programmer time with a loaded hourly rate of \$80 for a total of \$3,200. The cost for cleaning and analyzing the data that is collected on the HSES is estimated at 100 hours of programmer time with a loaded hourly rate of \$80 for a total of \$8,000.

In total the Head Start/Early Head Start Emergency Preparedness Survey will cost the government \$26,407.90, which also represents the annual cost. This is a one time data collection.

A15. Explanation for Program Changes or Adjustments

This submission to OMB is a new request for approval.

A16. Plans for Tabulation and Publication and Project Time Schedule

A16.1 Analysis Plan

The data obtained in the Head Start/Early Head Start Emergency Preparedness Survey will be combined with demographic grantee information from the Enterprise system (e.g., locality, number of classrooms and children served, percentage of dual language learner children). The data will be analyzed using basic statistical techniques including frequencies, percentages and cross-tabulations. Survey items will first be examined for general responses (e.g., frequencies/percentages of yes/no responses). Second, data analysis will include a close examination of demographic features of grantees and how their responses to the survey compare with one another. For example, how the locality of a grantee relates to the presence of Emergency Preparedness procedure and plans. A data table shell might look like the following:

Has your program developed emergency preparedness and response policies and procedures for large-scale emergencies?

Locality	Yes %	No %
Rural		
Rural/Urban		
Urban		

A16.2 Time Schedule and Publications

Information collection will begin promptly after OMB approval is given.

Activity	Time Schedule
Survey Administration	September 30, 2009-December 30, 2009
Data Cleaning	December 31, 2009-January 31, 2010
Data Analysis and Reporting	February 1, 2010-May 2010
Report to Congress due	June 2010

A17. Reason(s) Display of OMB Expiration Date is Inappropriate

The Head Start/Early Head Start Emergency Preparedness Survey will display the expiration date for OMB approval.

A18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.