

## SUPPORTING STATEMENT

### Head Start Performance Standards - OMB 0970-0148

#### 1. Circumstances which make the data collection necessary

Head Start Performance Standards are the result of a legislative mandate to administer a high quality comprehensive child development program that serves low-income pregnant women, infants and toddlers, preschoolers and their families. The information collection aspects of the Performance Standards are a part of the many actions that local agencies must take to ensure they administer quality programs for Head Start children and families. It is important to note that the information collection items included in the Performance Standards are almost entirely record-keeping requirements for local Head Start programs; these records are intended to act as a tool for grantees and delegate agencies to be used in their day-to-day operations. Such records are maintained by the grantees and delegate agencies and are not information items that must be collected and forwarded to the Federal government. Of course, local programs are monitored for overall compliance with the Performance Standards, including the record-keeping aspects.

The Head Start program is authorized under the Head Start Act (the Act), as amended (42 U.S.C. 9801 *et seq.*). The current Head Start Performance Standards are found at 45 CFR Part 1304. They define requirements for Early Childhood Development and Health Services, Family and Community Partnerships and Program Design and Management

The 1994 reauthorization of the Head Start program required a revision of the Head Start Program Performance Standards in order to bring them up to date, cover new topics, and include services to infants and toddlers. However, the revisions were not to result in an elimination or reduction of requirements regarding the scope or types of health, education, parental involvement, nutritional, social or other services to a level below that of the requirements in effect on November 2, 1978. In particular:

- Section 641 prescribes procedures for corrective actions or terminations to be taken with agencies that fail to meet the standards described in subsection (a).
- Sections 642 require the Secretary to develop regulations with respect to parent involvement and support and transition-related activities, and community outreach and collaboration.
- Sections 644 requires the issuance of regulations setting standards for organization, management, and administration of Head Start programs.
- Section 645A requires that the Secretary develop program guidelines for Early Head Start, the program for low-income pregnant women and families with infants and toddlers.

In accordance with this legislative mandate, the Performance Standards underwent a major revision. The new standards were effective January 1, 1998 and form the bases of this burden estimate.. The standards state:

1304.51(g) Record-keeping systems.

Grantee and delegate agencies must establish and maintain efficient and effective record-keeping systems to provide accurate and timely information regarding children, families and staff and to ensure confidentiality of information.

The 1998 reauthorization of the Head Start program includes several additional areas of focus for Head Start grantees and delegate agencies.

- In selecting agencies to administer the Head Start program, the Secretary must consider the applicant's plan to meet the needs of non-English language children, including needs related to the acquisition of the English language (Section 641(A), and the needs of children with disabilities (Section 641(d)(8).
- Section 641A(a)(1)(B) requires the Secretary to establish education performance standards to ensure the school readiness of children participating in a Head Start program.
- Section 641A(b) requires the Secretary to establish results-based Educational Performance Measures.
- Section 642A(1) requires Head Start agencies to develop and implement a systematic procedure for transferring, with parental consent, Head Start program records for each participating child to the school in which the child will enroll.
- Section 648A requires the Secretary to ensure that each Head Start classroom in a center-based program is assigned a teacher who has demonstrated competency to: plan learning experiences that advance the intellectual and physical development of children; establish and maintain a safe, healthy learning environment; support the social and emotional development of children; and encourage the involvement of families.

In order to meet the legislative mandate of administering quality programs, records and other information must be kept. This type of record-keeping (information collection) will be limited to three purposes: to assess the quality of services provided to children and families; to support improvements in program management functions in order to promote quality programs; and to provide accountability in the expenditure of Federal funds in the provision of quality services. The complete set of Head Start Performance Standards can be found at [www.eclkc.ohs.acf.hhs.gov](http://www.eclkc.ohs.acf.hhs.gov)

## **2. Purpose and Use of the Information Collection**

The goal of the Head Start Program Performance Standards is to ensure that all children and families enrolled in Head Start are offered high quality services that are responsive to their needs. The information collection requirements are designed to support this goal.

Local program staff will use the required records and other information to support and improve the day-to-day operation and management of their programs in order to assure

quality. Federal staff, in their role as program monitors, will use the records and other information to assure compliance and promote quality through the provision of training and technical assistance.

**3. Use of Improved Information Technology and Reduction of Burden**

Head Start encourages grantees to acquire electronic recordkeeping systems and allows for the expenditure of grant funds to meet the acquisition costs of automated recordkeeping systems.

**4. Efforts to Identify Duplication and Use of Similar Information**

In complying with those regulations that require information collection, agencies are specifically directed to use and build upon existing information, whenever it exists. It is the intent of these regulations that duplicity of efforts be avoided, and that information collection occurs only when information is not available from another source.

**5. Impacts on Small Business or Other Small Entities**

Not applicable, large numbers of small business and small entities are not impacted...

**6. Consequence of Collecting Information Less Frequently**

If requirements in the Performance Standards for record-keeping and other information collection are not met, assessment of the quality of Head Start programs could not be assured. The Performance Standards provide both a uniform definition of quality services for the 2,600 community-based organizations nationwide that administer the program and a regulatory structure for the monitoring and enforcement of these standards. Without appropriate record-keeping, assurances of quality services and consequently compliance with regulations could not be guaranteed.

**7. Special Circumstances Related to Guidelines of 5 CFR 1320.5**

Not applicable. None of the circumstances described apply in the collection of this information.

**8. Comments in Response to the Federal Register Notice**

Intent to renew this information collection was published in the Federal Register on August 5, 2009, Vol. 54, Page 39078. No comments were received on this notice presumably because we were proposing no changes and grantees are well acquainted with the standards

**9. Explanation of Any Payment or Gift to Respondents**

Not applicable.

**10. Assurance of Confidentiality Provided to Respondents**

Not applicable.

**11. Justification for Sensitive Questions**

Not applicable.

**12. Estimates of the hour burden and costs**

Head Start Performance Standards	Number of Respondents	Number of Responses per Respondent	Burden Hours per Response	Total Burden Hours
Recordkeeping	2,590	1	670.895	1,732,192

The monetary equivalent is 1,732,192 X \$20 or \$34,643,840/.

**13. Annualized Cost per Respondent**

Not applicable. Monetary costs associated with information collection requirements for Head Start are the salaries of the staff performing the duties. Costs are assumed by the Federal Government through the provision of program operating costs.

**14. Estimate of Cost to Federal Government**

Not applicable.

**15. Explanation for Program Changes or Adjustment**

There is no program change or adjustment.

**16. Plans for Tabulation and Publication**

There are no plans to publish information resulting from the compiling of children and families records in connection with Head Start program services.

**17. Reasons that Display of Expiration Date is Inappropriate**

OMB expiration date will be displayed on the Head Start Performance Standards

**18. No exceptions to the certification statement are contemplated.**

**No Statistical Methods of Analysis are conducted.**

**B. Requirements are application to all grantees\**

**C. There is no central collection of information**

**D. All grantees are monitored as required by the statute to assess their compliance with recordkeeping requirements**

**E. On site reviews procedures are validated to insure integrity of review findings.**