

SUPPORTING STATEMENT

45 CFR 1307

OHS-0153

A. Justification

1. Circumstances which make the data collection necessary

Section 641, 645A(b)(12) and 644(c) of the Head Start Act requires that the Secretary implement steps to obtain competition for the award of continuing financial assistance for Head Start program grantees when the incumbent grantees are not determined to be providing high quality comprehensive services. The Head Start Act establishes that grantees will be awarded grant funds for five year periods and only grantees delivering high quality services may be designated to continue to receive funding under the Act. This rule establishes the criteria that the Office of Head Start will consider and whether to provide a subsequent award to an incumbent non competitively or to compete the provision of services to determine the best provider of services in the community. This Rule does not replace OMB approved performance standards, but includes an evaluation of performance standards in making a determination. The Office of Head Start plans to issue an Information Memorandum informing grantees about how to comply with the new requirements by making an electronic notation in the grantee records contained in the Head Start Enterprise System. This package contains a “screen shot” of the record entry format and an Information Memorandum instructing grantees to make electronic notations in their records in the event that certain administrative events occur as noted in the NPRM.

2. Purpose and Use of the Information Collection

The information being collected will be used to determine if an incumbent Head Start and Early Head Start grantee will receive funding.

3. Use of Improved Information Technology and Reduction of Burden

Head Start and Early Head Start grantees are actively encouraged to acquire electronic recordkeeping systems and the Office of Head Start 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 new information

collection occurs only when information is not available from another source. It is not expected that new information will be created in the implementation of this rule.

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

The Act requires that the Office of Head Start evaluate grantee performance during every five year period. The rules provide both a uniform definition of quality services for the 1,600 community-based organizations nationwide that administer the program, and a regulatory structure for the monitoring and enforcement of these standards

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 establish this rule published in the Federal Register on (Insert date of Publication}.

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

45 CFR 1301	Number of Respondents	Number of Responses per Respondent	Burden Hours per Response	Total Burden Hours
Information Memorandum.	1,622	1	1	1,622
Total Burden Hours				1,622

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

There are no start up costs or acquisition costs associated with the rule. Costs are strictly clerical and monetary costs associated with this information collection requirements for Head Start are the salaries of the staff performing clerical duties and are assumed by the Federal Government through the provision of program operating costs. However due to the low impact of these rules, the Federal Government is not providing grantees with additional funds to offset clerical costs. Clerical costs for grantees are approximately \$12 per hour for a total cost estimate of approximately \$20,000. There are no additional resources made available to grantees because clerical costs are already included in grantee budgets.

14. Estimate of Cost to Federal Government

There are no costs to the government as this wholly automated information collection is the responsibility of grantees who maintain their records by making notations in a file when certain events are triggered.

15. Explanation for Program Changes or Adjustment

There is an additional small increase in burden.

16. Plans for Tabulation and Publications and Project Time Schedule

There are no plans to publish information.

17. Reason(s) that Display of Expiration Date is Inappropriate

OMB expiration date will be displayed on the Rule when it is final

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions contemplated

B. Statistical Methods (used for collection of information employing statistical method)

There are no statistical methods employed

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.