

**Supporting Statement**  
*Information Collection*

**OMB 0980-0017**

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**A. Justification**

**1. Circumstances Making the Collection of Information Necessary**

Section 650 of the Head Start Act (42 U.S.C. 9846) requires that the Secretary of the Department of Health and Human Services prepare and submit a report to the Congress at least once during every 2-year period. This report includes information contained in the “Program Information Report (PIR)” and certain fiscal information prepared with respect to Head Start programs.

The PIR is reported annually by all Head Start and Early Head Start grantees and delegate agencies to ascertain the status of the delivery of services to children and their families and to provide Congress and the public information about these services.

The Head Start Act of 2007 required that the Office of Head Start collect enrollment information from grantees on a monthly basis to determine whether grantees maintain their funded enrollment.

The Office of Head Start is responsible for the ongoing oversight and monitoring of programs.

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

The PIR data is used for the following principal purposes:

The information is used for program management at the local, Regional and National levels to analyze trends in the program, including program enrollment, program design, staffing patterns, staff credentials, family demographics and service needs, and access to health and social services and services for children with disabilities. The PIR database is used at the national and Regional levels to inform policy, program development, and planning. As one component of an ongoing monitoring system, the PIR is also used to track implementation of requirements and to promote compliance with applicable laws and regulations governing the Head Start and Early Head Start programs.

The PIR is a major source of information used to respond to Congressional and public inquiries about Head Start from groups such as child care associations, state administrators, and researchers. It is a primary source of information used to compile the Biennial Report to Congress on the Status of Children in Head Start Programs mandated by Section 650 of the Head Start Act.

The PIR is used to enhance access to service through web-based directories and mapping of local centers and programs. It is used for ongoing communications with responsible staff and performance monitoring related to reportable conditions such as loss of a center license which can impact services to families and children as well as planning and scheduling of onsite monitoring reviews.

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

PIR reports are submitted through the Head Start Enterprise System (HSES), an OMB-certified web-based application. There are no paper transactions. The automated filing provides accurate, edited data. The data on locations, contacts, and program types are prepopulated.

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

No similar information is available. The PIR is the only report on actual services submitted by all grantees and delegate agencies on an annual basis.

### **5. Impact on Small Businesses or Other Small Entities**

Not applicable. Small businesses and small entities are not impacted.

### **6. Consequences of Collecting the Information Less Frequently**

Head Start and Early Head Start have grown significantly. Interest in programs serving preschool children is growing rapidly. As a result of the volume of public and Congressional inquiries about enrollment and the status of children and families served, there is a need for current, updated information. In addition, the PIR is essential for reporting on performance measures and the implementation of Congressional mandates, such as teacher training and certification for which goals are set by legislation. (See Sections 645A(h), 645A(i) and Section 648A(2))

Options for less frequent collection and/or sampling approaches were considered and rejected. Any sampling approach will reduce the reliability of the data reported, particularly since the number of grantees and delegate agencies varies each year. Less than annual reporting may actually increase

the burden on grantees or delegate agencies who fail to implement adequate local management information and record keeping systems or have key staff changes.

The PIR database is utilized for most Head Start research efforts managed through the Office of Planning, Research and Evaluation, to define Head Start populations and to provide baseline information for planning and design. The PIR data is used as the basis for sampling classrooms for monitoring purposes.

**7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5**

Not applicable. No conditions as specified are required.

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

The Notice of Proposed Information Collection Activity and Comment Request was published in the Federal Register on February 11, 2011. One comment was received by the deadline. Respondent suggested that some clarifications be made and that the PIR be collected with greater depth and frequency. We clarified questions where necessary to meet the concerns of the respondent and are taking the comment related to depth and frequency under advisement for future PIRs.

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

Not applicable.

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

There is no confidential information contained in the data collection.

**11. Justification for Sensitive Questions**

Not applicable.

**12. Estimates of Annualized Burden Hours and Costs**

| Instrument | # of Respondents | # of Responses Per Respondent | Average Burden Hours/Minutes Per Response | Total Burden Hours |
|------------|------------------|-------------------------------|---|--------------------|
| Annual PIR | 2690             | 1                             | 4 hours                                   | 10,760             |
| Monthly    |                  |                               |   |                    |

|   |      |    |           |        |
|---|------|----|-----------|--------|
| Enrollment (Grantees only)                    | 1600 | 12 | 3 minutes | 960    |
| Contacts, Locations and Reportable Conditions | 2690 | 1  | 15        | 672    |
| Total Burden Hours                            |      |    |           | 12,392 |

Staff time per respondent is estimated at \$16.69 per hour x 4 hours (\$66.76) and 18 minutes (\$5.01) for an annual estimated total per respondent of \$71.77.

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

There is no cost burden on respondents. Respondents are not required to establish any special or new recording keeping systems. Data for the PIR is drawn from established records which would otherwise be compiled in conforming to the requirements of the Head Start Program Performance Standards (45 CFR 1301) such as enrollment and family records, staffing and employee turnover, and program characteristics. Response does not require the use of outside resources.

**14. Annualized Cost to the Federal Government**

|                |               |
|----------------|---------------|
| Contract:      | \$1,200,000   |
| Federal Staff: | <u>33,600</u> |
| Total:         | \$1,233,600   |

Federal staff costs are estimated to be 30% of the time of a Program Specialist (GS-14) to oversee the activities of the data contract and to be the lead for reports and responding to inquiries.

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

*Part 2 Forms, IC 1: Program Information Report (PIR) - Annual*  
 Significant efforts have been made to modernize the collection instruments and increase validations to assure data quality and timeliness in response to GAO reports and increased efforts in ongoing monitoring and oversight of services as required in the Head Start Act of 2007.

Changes were made to the staff qualifications sections to reflect requirements in the Head Start Act of 2007. The enrollment and eligibility section was also revised for this reason. The transportation section now reflects the full range of buses purchased with federal funds and provides information on the number of children receiving transportation services. Sequencing of questions, wording, grammar and clarifying language changes were included throughout the PIR. Many programs now have EHS which is considered a separate report; therefore, the respondents include grantees and delegates, Head Start and Early Head Start.

*Part 2 Forms, IC 2: Grantee Enrollment Reporting - Monthly*

Grantees are required to report aggregate enrollment on a monthly basis as required in the Head Start Act of 2007. Grantees report on behalf of their delegates, which is why the number of reporters is limited to 1,600 for this section. Using HSES, logging in, entering enrollment and average daily attendance and saving the information is estimated at 3 minutes per entry.

*Part 2 Forms, IC 3: Head Start Program Reporting - Occasional*

Head Start programs are asked to keep current contact information for key staff including names, positions and email addresses. They are also asked to maintain information on service locations. Pertinent location information is provided to the public primarily through Google maps at <http://eclkc.ohs.acf.hhs.gov> and through data.gov. This data is also used to plan Head Start monitoring reviews, which are required by statute. In addition, the Office of Head Start is requiring that it be informed when certain adverse conditions are present, such as when grantees incur a suspension of service due to a child care licensing violation, when they are added to the CACFP National Disqualified List, etc., in order to provide effective oversight and minimize community service disruptions.

There were no adjustments; however, the submission reflects a program change in the information collection. Enrollment reporting in the past was included in the annual survey as narrative text and is now split out to more accurately reflect the monthly frequency. Occasional reporting was added to facilitate electronic communications with key staff; currency of center locations so the information in the public domain is accurate and will assist consumer access to services and information needed to plan for and conduct monitoring reviews; and to increase management oversight and potential intervention when certain conditions occur that would impact the grantee's ability to provide high quality services. The change in estimated burden hours is slightly increased from 10,760 to 12,392.5. The time required for annual reporting is reduced by prepopulating static data and better clarifying what to report. The time required for monthly enrollment reporting is estimated at 3 minutes per response for 1600 grantees for a total of 960 hours. Occasional reporting of contact and location information changes and reportable

conditions is estimated at approximately 15 minutes annually per program for a total of 672.5.

#### **16. Plans for Tabulation and Publication and Project Time Schedule**

Annual National and Regional Fact Sheets on Head Start and Early Head Start will be produced. A biennial report to Congress and various Regional, State, and site level pre-programmed reports will draw information from the database for the current reporting period and historical data for the past several reporting years for comparison purposes. State and site level reports are important for program monitoring and performance measures. Reports are available to the public. The reporting platform is made available to state collaboration offices and state early childhood advisory councils to help coordinate program information with state services. A full zip file of the data will be posted in the public domain and will be updated as necessary to accommodate corrections and assure quality of information.

No complex analytical techniques are contemplated. Reports are largely population statistics and over time measurements designed to ascertain program quality and compliance with applicable laws and regulations.

If approved as proposed, the annual information collection will be due to be submitted by August 31, 2011. Reports are made available immediately and are automatically updated as corrections are submitted.

#### **17. Reason(s) Display of OMB Expiration Date is Inappropriate**

Not applicable.

#### **18. Exceptions to Certification for Paperwork Reduction Act Submissions**

Not applicable.

#### **B. Statistical Methods (used for collection of information employing statistical methods)**

Not applicable. No statistical methods of analysis of the PIR results are proposed. All entities receiving Head Start or Early Head Start funds are required to submit the report and 100% response rate is achieved annually.