

# OMB 0970-0427

---

## **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.

Section 641A of the Head Start Act of 2007 (42 U.S.C. 9836A) requires that the Office of Head Start collect enrollment information from grantees on a monthly basis to determine whether grantees maintain their funded enrollment.

Section 644 of the Head Start Act (42 U.S.C. 9839) requires each Head Start Agency to make available to the public a report published at least once in each fiscal year.

Head Start regulations (45 CFR 1307.4) became effective December 9, 2011. It requires grantees to report when certain conditions occur (license revocation, bankruptcy, debarment, disqualification from CACFP, or certain audit findings). Regulations (45 CFR 74.51) require grantees to immediately notify any developments that have a significant impact on the award-supported activities. Also, notification shall be given in the case of problems, delays, or adverse conditions which materially impair the ability to meet the objectives of the award. This notification shall include a statement of the action taken or contemplated, and any assistance needed to resolve the situation. “Reportable Conditions” provide an electronic format for grantees to fulfill these requirements. Programs are governed under government-wide federal regulations by type of agency. A new guidance, the Omni Circular, was published on December 26, 2013 (Federal Register Vol. 28, No. 248) and will be implemented on December 26, 2014.

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.

Monthly enrollment is primarily used to determine whether grantees maintain their funded enrollment.

Reportable Conditions is primarily used for program management and to determine whether grantees will be subject to competition at the end of their current project period.

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.

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

Information is 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.

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**

A Comment Request was published in the Federal Register Volume 79, page 31339 on June 2, 2014 and a number of responses were received in response to this notice. Both requested and received copies of the PIR survey.

The Office of Head Start publicized the opportunity for comment on the Early Childhood Learning and Knowledge Center (ECLKC) public website <http://eclkc.ohs.acf.hhs.gov/hslc/data/pir>, which is used primarily by the Head Start community, including Head Start programs and parents of children in the communities, followed by an eblast to over 2,000 recipients requesting comments.

As a result of additional outreach, 30 comments were received that included national organizations like the National Head Start Association (NHSA), Center for Law & Social Policy (CLASP), and the Association of State and Territorial Dental Directors (ASTDD); as well as individual Head Start grantees and community action agencies. Most comments requested further definition or instructions to understand what was being asked for. A third of the comments praised the proposed changes.

**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	Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Response	Total Burden Hours
Head Start Program Information Report	3,041	1	4	12,164
Grantee Monthly	1,773	12	0.05	1,063.8

Enrollment Reporting				
Contacts, Locations & Reportable Conditions	3,041	1	0.25	760.25
Total Burden Hours				13,988.05

Staff time per respondent is estimated at \$17.03 per hour x 4 hours (\$68.12) and 18 minutes (\$5.11) for an annual estimated total per respondent of \$73.23.

### 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:	\$750,000
Federal Staff:	<u>35,000</u>
Total:	\$785,000

Federal staff costs are estimated to be 15% of the time of a Program Specialist (GS-14) to oversee the activities of the data contract and 15% of the time of a Program Specialist (GS-12) to be the lead for reports and responding to inquiries.

### 15. Explanation for Program Changes or Adjustments

The estimated burden hours were adjusted from 12,392.50 to 13,988.05 to anticipate the increase in number of respondents. The Consolidated Appropriations Act, 2014 charged the Department with expansion of Early Head Start programs, for conversion of Head Start services to Early Head Start services, and for new discretionary grants for high quality infant and toddler care through Early Head Start-Child Care (EHS-CC) Partnerships. This act increased the projected number of grantees responding to the collection. Information collected on partners was updated to align with the new EHS-CC partnership discretionary grants.

*Part 2 Forms, IC 1: Program Information Report (PIR) - Annual*

Efforts are made to modernize the collection instruments and increase validations to assure data quality and timeliness and increased efforts in ongoing monitoring and oversight of services.

Grammar, consistency, and clarity edits are made based on feedback in HSES. These changes do not affect the intent or context of the questions or their instructions. These edits can vary for each type of grant, i.e. Head Start preschool programs, Early Head Start programs, and Migrant and Seasonal Head Start programs.

Question choices are updated or added based on feedback and text in open ended responses (e.g. added options for when choosing a curriculum). Choices are also consolidated or removed as was the case for health insurance options and chronic conditions.

Definitions are added for questions that receive frequent inquiry from the respondents.

*Part 2 Forms, IC 2: Grantee Monthly Enrollment Reporting - Monthly*  
Grantees report on behalf of their delegates, which is why the number of respondents is limited to 1,773 for this section.

*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. Information collected on partners was updated to include the new EHS-CC partnership discretionary grants.

## **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, 2015. 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.