

SUPPORTING STATEMENT

Head Start Eligibility Verification
OMB Control #: 0970-0374

A. Justification

1. Circumstances Making the Collection of Information Necessary

The Final Rule on eligibility is published under the authority granted to the Secretary of Health and Human Services under the Head Start Act (Act) at sections 644(c), 645(a)(1)(A), and 645A(c). The changes to the prior rule clarified Head Start's eligibility procedures and enrollment requirements, and reinforce Head Start's overall mission to support low-income families and early learning. We published a Final Rule on February 10, 2015 at 80 FR 7368 (<https://federalregister.gov/a/2015-02491>) and the requirements for establishing eligibility for the enrollment of children in Head Start programs are documented as follows:

- Section 1305.4(d)(2): If programs chooses to enroll participants whose family incomes are between 100 and 130 percent of the poverty line, then they must maintain records to be able to report specified information
- Section 1305.4(h),(i), and (j): Verification requirements for verifying age, income, and categorical eligibility
- Section 1305.4(l): Record keeping requirements of determination records for each participant and on-going training records for program staff

There is no standardized document for grantees to use for any of these requirements. Still, OHS developed a sample form to assist grantees in collecting information to meet record keeping requirements for eligibility determination records in section 1305.4(l). The sample form facilitates an efficient and accurate determination and documentation of childrens' eligibility for Head Start. However, Head Start programs are not required to use this specific form. Grantees may adapt this sample form or design a form that is relevant to their program in order to meet the requirements. The sample form is designed to meet certain requirements of the eligibility determination record, specifically the form includes a statement that program staff has made reasonable efforts to verify information by an in-person or telephonic interview, describes efforts made to verify eligibility, and identifies the category of eligibility.

Programs must store eligibility determination records as long as the child is enrolled and for one year after they have either stopped receiving services or are no longer enrolled. They can be maintained electronically or in hard copy.

2. Purpose and Use of the Information Collection

The Final Rule and the accompanied required information collection and record keeping requirements provides a balanced approach to program administration, improves overall program effectiveness, and better aligns us with current practices in the field. It also ensures only the neediest families receive Head Start services first.

3. Use of Improved Information Technology and Burden Reduction

Records can be maintained electronically. The sample form can be filled out electronically and is distributed through the Head Start website.

4. Efforts to Identify Duplication and Use of Similar Information

Providing a sample form eases the process and reduces the likelihood that a form will need to be re-done. The sponsored information collection will be used to collect information required by regulation. Duplication or use of similar information is not an issue.

5. Impact on Small Businesses or Other Small Entities

This information collection should not have any impact on small businesses or other small entities.

6. Consequences of Collecting the Information Less Frequently

This does not apply since the information is only collected when determining eligibility of a child. If a child is determined eligible under this section and is participating in a Head Start program, he or she will remain eligible through the end of the succeeding program year. This information must be gathered for every child enrolled in a Head Start program. Use of the sample form will increase the likelihood of grantee compliance with these important regulations, and reduce the likelihood of repetitive record-keeping.

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

There are no special circumstances.

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

This information collection was published for comment in the Federal Register Volume 80, Number 186 (Friday, September 25, 2015) Pages 57828-57829. One comment was received by a rural Head Start program that stated there will be an increased burden to comply with the record keeping requirements of verifying income eligibility. We already recognized the added burden of the programs to verify eligibility and it is reflected on the burden table, therefore no changes were made. The comment also expressed concern with changes in the final rule but these were unrelated to this information collection request and the comments would have been considered as part of the rulemaking.

9. Explanation of Any Payment or Gift to Respondents

There will be no payment or gift to respondents.

10. Assurance of Confidentiality Provided to Respondents

All the records will be maintained on site with the grantee.

11. Justification for Sensitive Questions

There are no sensitive questions.

12. Estimates of Annualized Burden Hours and Costs

Requirement	Number of Respondents	Number of Responses per Respondent	Average Burden per Respondent (hours)	Total Burden Hours
§1305.4(l) Eligibility determination records (<i>sample form</i>)	1,600	478	.10	76,480
§1305.4(d)(2)	20	1	2	40
§1305.4(h),(i), and (j)	1,600	1	15	24,000
§1305.4(l) Other Record Keeping	1,600	1	15	24,000

Estimated Total Annual Burden Hours:

124,520

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

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. Annualized Cost to the Federal Government

None since the information is collected and maintained by the grantee.

15. Explanation for Program Changes or Adjustments

Program changes include record keeping of eligibility determination records and clarifications on eligibility requirements. We revised the sample form to align with these program changes. The burden per respondent slightly increased for the form since we added a question on type of interview conducted. The number of respondents decreased for the sample form since a child remains eligible through the end of the succeeding program year and children which stayed in the program for two years are no longer counted.

16. Plans for Tabulation and Publication and Project Time Schedule

These will not be published.

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

N/A

18. Exceptions to Certification for Paperwork Reduction Act Submissions

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

This information collection does not employ statistical methods.

1. Respondent Universe and Sampling Methods
2. Procedures for the Collection of Information
3. Methods to Maximize Response Rates and Deal with Nonresponse
4. Test of Procedures or Methods to be Undertaken
5. Individuals Consulted on Statistical Aspects and Individuals Collecting and/or Analyzing Data