## **Supporting Statement**

Information Collection

#### Head Start Program Grant Application and Budget Instrument OMB 0970-0207

#### A. Justification

## 1. Circumstances Making the Collection of Information Necessary

Sections 641, 642, 643, and 644 of the Head Start Act [42 U.S.C. 9839] prescribe the conditions program applicants must meet and the services applicants must provide in order to be eligible to receive funding under the Head Start Act. Applicants are required to demonstrate that they are meeting prescribed funding and service priorities when submitting annual applications for continued funding. In addition to the requirements of the Act, priorities for the use of funds and delivery of services are provided to applicants annually through the provision of information memos and program instructions pursuant to the requirements for the use of funds as specified in annual appropriations by the Congress.

The Head Start Bureau adopted a uniform OMB approved application and budget instrument to standardize the format for the collection of this information in April 2000, and provided applicants with the capacity to submit this information electronically in an effort to improve the efficiency of the application process. This instrument is called the Grant Application and Budget Instrument, or the GABI.

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

The information submitted by applicants assists granting officials in determining whether the applicant meets the requirements for continued funding under the requirements of the Head Start Act and the requirements for the use of funds as specified in annual appropriations by the Congress.

# 3. Use of Improved Information Technology and Reduction Burden

Applicants may submit this information electronically.

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

Information submitted by applicants is not duplicated in other information collection activities.

#### 5. Impacts on Small Businesses or Other Small Entities

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

## 6. Consequences of Collecting the Information Less Frequently

By promulgating this information collection the Office of Head Start established a three-year application cycle. Applicants are required to submit full applications once in every three year period and may satisfy the application requirements by submitting updates, if applicable, in succeeding years. This procedure reduces the frequency of the information collected.

# 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 60 day notice was published on December 23, 2015 and the notice can be found on the Federal Register Volume 80, Number 246, Page 79903. Two comments were received. One commenter requested a copy of the information collection instrument which the Office of Head Start provided. The other commenter indicated that there is additional information related to the GABI that is requested by the Head Start Regional Offices that is not included in the ICR. Head Start Regional Offices may request supporting documentation for information submitted in the GABI. However, the supporting documentation is not burdensome since it should come from existing records needed to complete the GABI. No changes were made in response to this comment.

# 9. Explanation of Any Payment or Gift to Respondents

Not applicable.

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

Not applicable, no confidential information will be collected.

# 11. Justification for Sensitive Questions

Not applicable. There are no answers to sensitive questions required.

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

Instrument	Number of	Number of	Average Burden	Total Burden
	Respondents	Responses per	Hours per	Hours
		Respondent	Response	
HS grant and				
budget	2,000	1	33	66,000
instrument				

Estimated Total Annual Burden Hours:

66,000

The cost of the hourly burden is 66,000 X \$30 or \$1,980,000.

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

No annual costs; respondents are not required to establish any new recordkeeping. Information collected is drawn from grantees established records of program operations.

## 14. Annualized Costs to the Federal Government

The cost to the federal government is zero dollars.

## 15. Explanation for Program Changes or Adjustments

There is an adjustment due to the increase in the annual number of respondents. There is no change in hourly burden for each respondent.

There is no program change (i.e. material change to the collection instrument, instruction, its frequency of collection, or the use to which the information is to be put).

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

There are no plans to publish the information submitted other then in a public record of any proceedings which might occur.

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

The last paragraph of the rule contains the OMB expiration date.

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

#### **B.** Collection of Information Employing Statistical Methods

- **1.** Rules apply to all grantees
- 2. There is no central collection of information
- 3. All grantees are monitored to assess their compliance with this rule
- 4. On site review procedures are validated to insure integrity of information findings.
- 5. Not statistical methods of analysis are conducted.