

OMB 0970-0427 - Head Start Program Information Report

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 Program Performance Standards (45 CFR 1304.12) requires grantees to report when certain conditions occur (license revocation, bankruptcy, debarment, disqualification from CACFP, or certain audit findings). Federal 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.

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. 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 and to measure the efficiency of Head Start which is included in the Annual ACF Budget Request and are a part of the HHS strategic plan.

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. 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.

Contact information is collected from key personnel to send correspondence, electronic signatures, and general grant administrative purposes.

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

Since Head Start's inception in 1965, Head Start has provided high-quality, comprehensive services to more than 33 million children and their families. In the 2015 program year, 97% of children had received their necessary immunizations. In preschool center-based classrooms, 96% of classroom teachers had an AA or higher in Early Childhood Education or related field. These figures would not be available on an annual basis without this information collection.

Interest in early childhood programs continues to grow. 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 and information on how it has changed over time. 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 60 day notice was published on 5/19/17 and the notice can be found on the Federal Register Volume 82, Number 96, Pages 23009-23010. Two comments were received. One comment requested a copy of the PIR which was provided and another comment requested we collect information regarding “tobacco cessation services” among the types of family services question. Currently we collect “health education” in the list of family services which would include families learning about the consequences of tobacco use. We are considering expanding the health education item to better understand the different types of education opportunities provided to families, but this will not be a change to the current version of the PIR data collection since system developers and programs need more notice if robust changes are made.

Changes to the PIR are carefully considered based on HSES Help Desk feedback, grantee comments on previous PIRs, and statutory and regulatory language. The HSES Help Desk can be reached by e-mail and phone.

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	3,267	1	4	13,068
Grantee Monthly	2,049	12	0.05	1,229

Enrollment Reporting				
Contacts, Locations & Reportable Conditions	3,267	1	0.25	817
Total Burden Hours				15,114

Staff time per respondent is estimated at \$17.03 per hour for a total of \$257,391.

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. Additionally, contract costs for maintaining and updating the PIR data and reporting system are included.

15. Explanation for Program Changes or Adjustments

The estimated burden hours were adjusted from 13,988 to 15,144 for additional grant awards since 2014 and to anticipate the increase in number of respondents in 2017.

16. Plans for Tabulation and Publication and Project Time Schedule

Annual National and Regional Fact Sheets on Head Start and Early Head Start are produced and published online. A biennial report to Congress and various Regional, State, and site level pre-programmed reports draw information from

the PIR database. State and site level reports are important for program monitoring and measuring performance. PIR data reports and extracts are available to the public. The reporting platform is made available to state collaboration offices and state early childhood advisory councils to coordinate program information with state services. Reports using PIR data and how to access PIR data is located on HSES is available on the OHS website for the public at <https://eclkc.ohs.acf.hhs.gov/data-ongoing-monitoring/article/program-information-report-pir>. Data in HSES are made available soon after the reporting deadlines and are automatically updated as PIR corrections are submitted.

No complex analytical techniques are contemplated.

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.