

Supporting Statement
Information Collection

Head Start Eligibility Verification
OMB 0970-0374

A. Justification

1. Circumstances Making the Collection of Information Necessary

The Head Start Program Performance Standards (HSPPS) regulations on eligibility in 45 CFR 1302.12 (<https://eclkc.ohs.acf.hhs.gov/policy/45-cfr-chap-xiii/1302-12-determining-verifying-documenting-eligibility>) is published under the authority granted to the Secretary of Health and Human Services under the Head Start Act, as amended, (42 USC 9801 et seq) at sections 644(c), 645(a)(1)(A), and 645A(c).

There is no standardized document for grantees to use for any of the eligibility determination requirements in 45 CFR 1302.12. Still, OHS developed this sample form to assist grantees in collecting information to meet record keeping requirements for eligibility determination records. The sample form facilitates an efficient and accurate determination and documentation of 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.

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. This form can be part of that eligibility determination record alongside other documentation required as part the record.

The Office of Head Start is requesting an extension, with changes, of the Head Start Eligibility Verification. Changes are minor and provide some additional clarification to the form. Some previously approved burden under this OMB # are now accounted for under the new HSPPS (0970-0148) and therefore are removed from this information collection request. See section A15 for additional details.

2. Purpose and Use of the Information Collection

This sample form is used by programs to facilitate an efficient and accurate determination and documentation of eligibility for Head Start.

3. Use of Improved Information Technology and Reduction Burden

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

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

5. Impacts on Small Businesses or Other Small Entities

Not applicable.

6. Consequences of Collecting the Information Less Frequently

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 requirements on eligibility determination record and reduce the likelihood of repetitive record-keeping. Without this information collection, programs will all have the burden of developing and maintaining a similar form.

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

Not applicable.

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

A 60-day notice was published on December 21, 2018 and the notice can be found on the Federal Register Volume 83, Number 245, Page 65678. A few requests for the instrument were received; the Office of Head Start provided the proposed information collection in response to all requests. No comments were received.

9. Explanation of Any Payment or Gift to Respondents

Not applicable.

10. Assurance of Confidentiality Provided to Respondents

Not applicable. All the records will be maintained on site with the grantee.

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
Eligibility Verification Form	1,574	428	.025	16,842

Estimated Total Annual Burden Hours:

16,842

The job code is 39-9011 and wage data from May 2017 is \$10.72 per hours. Therefore, to account for fringe benefits and overhead the rate is multiplied by two which is \$21.44. The estimate of annualized cost to respondents for hour burden is \$21.44 times 16,842 or \$361,092. https://www.bls.gov/ooh/personal-care-and-service/childcare-workers.htm?view_full#tab-1.

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

No other annual costs. Information collected is drawn from grantees established records of the eligibility determination documentation process.

14. Annualized Costs to the Federal Government

No cost to the government since the information is collected and maintained by the grantee.

15. Explanation for Program Changes or Adjustments

The overall burden has been greatly reduced due to the revised HSPPS. The previously approved information collection under this OMB # had a calculated burden of 124,520 hours. This covered the burden to complete the full eligibility determination record, which included filling out the form itself among other record keeping requirements from the prior HSPPS. These record keeping requirements and the burden associated were addressed and accounted for during the rule-making process of the new HSPPS (see Federal Register Notice [81 FR 61293](#) and OMB #0970-0148 for burden approved under the new HSPPS). The only burden associated with this revised information collection request is now the standalone estimated burden in filling out the form which is estimated to take 1.5 minutes per response.

There is a slight decrease to the annual number of respondents.

The annualized cost in section A12 was updated per new OMB guidance.

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

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submission.

Not applicable.

B. Collection of Information Employing Statistical Methods

Section B. not applicable. No statistical methods are proposed.