

Supporting Statement
Information Collection

Head Start Program Information Report
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 (HHS) prepare and submit a report to the Congress at least once during every 2-year period.

Section 641A of the Head Start Act of 2007 (42 U.S.C. 9836A) requires that the Office of Head Start (OHS) 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.

OHS is requesting an extension, with changes, of the Head Start Program Information Report information collection authority. The following instruments are included in this information collection: (1) the Program Information Report Form (PIR), (2) monthly enrollment, and (3) center locations and contacts.

Public Law 110-134, Improving Head Start for School Readiness Act of 2007, reauthorized the Head Start program and Congress called for a review and revision of the Head Start Program Performance Standards (HSPPS). The Administration for Children and Families (ACF) published a Final Rule on Sept. 1, 2016 revising the HSPPS. Changes were made to the PIR and monthly enrollment instruments and these changes are primarily to align with the revised Head Start Program Performance Standards.

The revised HSPPS are streamlined, simplified, and reorganized to improve clarity and transparency to support high-quality program delivery and minimize administrative burden. As such, changes to the PIR were made for streamlining, improving clarity, and reducing administrative burden where possible.

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 data 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 data is used often by 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.

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.

Pertinent location information is provided to the public primarily through Google maps at <http://eclkc.ohs.acf.hhs.gov>. This data is also used to plan Head Start monitoring reviews. In addition, OHS 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.

This information collection is also used for planning and scheduling of onsite monitoring reviews.

3. Use of Improved Information Technology and Burden Reduction

Information is submitted through the Head Start Enterprise System (HSES). 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.

6. Consequences of Collecting the Information Less Frequently

Figures on actual program services would not be available on an annual basis without this information collection such as % of children that received their necessary immunizations and % of classroom teachers with an AA or higher in Early Childhood Education or related field.

Interest in early childhood programs including enrollment and the status of children and families served is ongoing; there is a need for current program information. In addition, the PIR is essential for reporting on performance measures and the implementation of Congressional mandates.

OHS has considered collecting information less frequently than an annual basis, but programs and system developers have indicated it may increase the burden of the collection since having a steady annual collection supports reliable reporting and record-keeping. Additionally, it was indicated that programs need to collect it on an annual basis for their own purposes and having access to data reported by other programs is helpful.

Without PIR data, research studies would have to develop additional information collections to compensate for the missing data. Also, monitoring would need to develop a new method and propose a new data collection for planning and scheduling on-site reviews.

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 21, 2018 and the notice can be found on the Federal Register Volume 83, Number 245, Page 65677-65678. A few requests for the instrument were received; OHS provided the proposed information collection in response to all requests. No comments were received through this federal register notice.

OHS believes no comments were received through the 60-day notice since an effort was made to collect preliminary and general feedback prior to the 60-day notice. Specifically, OHS published a much earlier request for public comment on proposed changes to the PIR on March 9, 2018, and the notice can be found at Federal Register Volume 83, Number 47, Page 10486. All comments received were carefully considered prior to the proposed changes submitted as part of the 60-day notice under the Paperwork Reduction Act.

9. Explanation of Any Payment or Gift to Respondents

Not applicable.

10. Assurance of Confidentiality Provided to Respondents

Not applicable.

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 PIR	3,404	1	1	3,404
Monthly Enrollment	2,160	12	0.05	1,296
Center Locations and Contacts	3,404	1	0.25	851
Total Burden Hours				5,551

The job code is 11-9031 and wage data from May 2017 is \$23.69 per hours (child day care services). Therefore, to account for fringe benefits and overhead the rate is multiplied by two which is \$47.38. The estimate of annualized cost to respondents for hour burden is \$47.38 times 5,551 or \$263,006.

<https://www.bls.gov/oes/2017/may/oes119031.htm>.

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

There is no other 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 HSPPS 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

There is an adjustment due to the increase in the annual number of respondents. The annualized cost in section A12 was updated per new OMB guidance.

The burden hours were reduced greatly based on feedback from grantees. The actual burden for submitting the PIR is very low (now estimated at 1 hour) since their record-keeping systems are designed to automatically submit the PIR following validation checks.

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 data. State and site level reports are important for program monitoring and measuring performance. PIR data reports and extracts are available to the all Head Start programs and to the public. Reports using PIR data and how to access PIR data 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>. 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 this information collection and regional offices and automatic system notices help ensure submission.