

**Supporting Statement**  
Information Collection

**Head Start Program Performance Standards**  
**OMB 0970-0148**

**A. Justification**

**1. Circumstances Making the Collection of Information Necessary**

In the Improving Head Start for School Readiness Act of 2007, Congress directed HHS to develop “scientifically based and developmentally appropriate education performance standards related to school readiness.” Congress also instructed that the update “ensure that any such revisions in the standards do not result in the elimination of or any reduction in quality, scope, or types of health, educational, parental involvement, nutritional, social, or other services.”

Fulfilling Congress’s call for a review and revision of the program performance standards, the Office of Head Start (OHS) announced in the Federal Register in 2016 the first comprehensive revision of the Head Start Program Performance Standards (HSPPS) since their original release in 1975. This information collection was approved alongside the final rule for the HSPPS.

This information collection is entirely record keeping and does not contain any standardized instruments or instructions. The information collection aspects of the HSPPS are a part of the many actions that local agencies must take to ensure they administer quality programs for Head Start children and families. These records are intended to act as a tool for grantees and delegate agencies to be used in their day-to-day operations. For example, this includes the requirement that programs maintain a waiting list of eligible families. The recordkeeping requirements are not collected through standard instruments to provide flexibility for local programs. Overall compliance with the HSPPS is measured through monitoring which may include recordkeeping aspects.

There are no changes to the record keeping requirements contained in this information collection. Only minor adjustments were made to the estimated burden based on updated enrollment and staff data.

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

The goal of the HSPPS is to ensure that all children and families enrolled in Head Start are offered high quality services that are responsive to their needs as congressionally mandated. The information collection requirements are designed to support this goal.

Local program staff will use the required information collections (i.e. recordkeeping) to support and improve the day-to-day operation and management of their programs in order

to assure quality. Federal staff or federal contractors in their role as program monitors and oversight will use the information to assure compliance and promote quality through the provision of training and technical assistance.

### **3. Use of Improved Information Technology and Reduction Burden**

Head Start encourages grantees to acquire electronic recordkeeping systems and allows for the expenditure of grant funds to meet the acquisition costs of automated recordkeeping systems.

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

In complying with these record-keeping requirements, agencies are directed to use and build upon existing information, whenever it exists. It is the intent of these requirements that duplicity of efforts be avoided, and that information collection occurs only when information is not available from another source.

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

Not applicable.

### **6. Consequences of Collecting the Information Less Frequently**

The HSPPS provide a regulatory structure for the monitoring and enforcement of these standards for all Head Start and Early Head Start programs operated by community-based organizations nationwide. Without appropriate collection of the information required by the standards, a comprehensive assessment of quality services and consequently compliance with regulations could not be assured.

### **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 May 31, 2019 and the notice can be found at 84 FR 25280. One request was received for a copy of the information being collected and a list of record keeping requirements under this information collection was provided. No comments were received.

### **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

Depending on the standard, the calculated burden hours is based on the individual enrollee (1,054,720), family (956,120), program (3,020), or staff (265,030). In a few cases, only a proportion of one of these may apply.

Record Keeping Standard	Number of Respondents	Average Burden Hours per Response	Total Burden Hours
<b>Part 1301 – Program Governance</b>			
1301.6(a) Establish written impasse procedures for resolving internal disputes	3,020	0.70	2,114
<b>SUBTOTAL</b>			<b>2,114</b>
<b>Part 1302 – Program Operations</b>			
<b>Subpart A – ERSEA</b>			
1302.12(k) Documenting eligibility	1,054,720	.166	175,084
1302.14(c) Maintain a waiting list	3,020	2.00	6,040
1302.16(b) Manage systematic program attendance issues	3,020	5.00	15,100
<b>SUBTOTAL</b>			<b>196,224</b>
<b>Subpart C – Education and Child Development Program Services</b>			
1302.33(a) and (b) Obtain child developmental screenings and conduct standardized and structured assessment for individualizations	1,054,720	1.00	1,054,720
1302.33(c)(2) Dual Language Learners Assessment	294,632	2.00	589,264
<b>SUBTOTAL</b>			<b>1,643,984</b>
<b>Subpart D – Health Program Services</b>			
1302.42(a) and (b) Obtain determinations of child health status, source of health care, and identify each child’s nutritional health needs	1,054,720	0.66	696,115
1302.42(e) Documents lack of available funds for assessment and treatment	3,020	0.50	1,510
1302.47(b)(7)(iv) Maintaining records on the administration of medication	3,020	0.50	1,510
<b>SUBTOTAL</b>			<b>699,135</b>
<b>Subpart E – Family and Community Engagement Program Services</b>			
1302.53 (b) & (d) Joint agreements, procedures, or contracts with community organizations and memorandum of understanding with the appropriate local entity responsible for managing publicly funded preschool programs in the service area of the program	3,020	0.166	501
<b>SUBTOTAL</b>			<b>501</b>
<b>Subpart I – Human Resources Management</b>			
1302.90(a) Written personnel policies for staff	3,020	0.50	1,510
1302.90(b)(1)(i)-(iv),(b)(4) Criminal record checks	79,509	0.33	26,238
1302.93(a) Ensure all staff has an initial health examination and	26,503	0.25	6,626

periodic re-examination			
1302.94(a) Regular volunteer screening for tuberculosis	3,020	0.166	501
<b>SUBTOTAL</b>			<b>34,875</b>
<b>Subpart J – Program Management and Quality Improvement</b>			
1302.101(a)(4) Maintain automated accounting and record keeping system	3,020	79.00	238,580
1302.102(b)-(c) Collect and use data to monitor program performance and continuous improvement, and conduct a self-assessment and community assessment			
1302.102(d)(3) If deficient, EHS or HS program submits Quality Improvement Plan	110	10.00	1,100
<b>SUBTOTAL</b>			<b>239,680</b>
<b>Subpart 1303 – Financial and Administrative Requirements</b>			
1303.12 Submit proof of coverage	3,020	0.166	501
1303.22-24 Parental Consent, Annual Notice, and Recordkeeping of PII Disclosure	956,120	0.33	315,520
1303.42-53 Applications for the purchase, construction or renovation of facilities; record retention and submission of documents on facilities	260	40.00	10,400
1303.70(c) Waiver request	200	1	200
1303.72(a)(3) Up-to-date child rosters and lists of adults each child is authorized to be released to are maintained.	3,020	2	6,040
<b>SUBTOTAL</b>			<b>332,661</b>
<b>TOTAL</b>			<b>3,149,174</b>

To calculate the cost specific to the recordkeeping requirements for this item of the OMB Clearance Package, we averaged the hourly wage for a teacher and an assistant teacher (\$15.45) as a proxy for the wage associated with the recordkeeping burden hours. The data used to calculate the hourly wage comes from the 2018 Head Start Program Information Report (PIR). To account for fringe benefits and overhead the rate is multiplied by two which is \$30.90. We multiply the total number of burden hours by this wage to estimate an annualized burden cost of \$97,309,477.

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

No other annual costs.

### 14. Annualized Costs to the Federal Government

The estimated annual cost to the federal government is \$750,000. This estimate is based on 400-800 monitoring visits per year where 20-40 hours are spent by monitoring reviewers to review the records maintained by the Head Start grantee.

### 15. Explanation for Program Changes or Adjustments

The estimated burden was updated based on most recent data on enrollee, (1,054,720), family (956,120), program (3,020), and staff (265,030) counts.

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

Not applicable. There are no plans for publication or tabulation.

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

OMB expiration date should not be displayed since there is no single standard form related to this OMB Clearance Package.

**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.