

Supporting Statement
Information Collection

Head Start Program Performance Standards
OMB 0970-0148

A. Justification

1. Circumstances Making the Collection of Information Necessary

Section 641A of the Head Start Act, 42 U.S.C. 9836A, directs U.S. Department of Health and Human Services (HHS) to develop “scientifically based and developmentally appropriate education performance standards related to school readiness” and “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 and later extended for three years without changes in October of 2019 with a new expiration date of October 31, 2022.

This request is for a slight revision to the burden table as a result of regulatory changes to Section 1304 of the HSPPS. A notice of proposed rulemaking was published on August 13, 2019 for these changes.

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.

This information collection is entirely record keeping and does not contain any standardized instruments to provide flexibility for local programs. 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. 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 Notice of Proposed Rulemaking (NPRM) regarding the regulatory changes to Section 1304 of the HSPPS was published on August 31, 2019 and included notice of the changes to this record-keeping requirement. The notice can be found at 84 FR 39996. No comments were received.

Although no comments were received in response to the Paperwork Reduction Act section of the NPRM, comments were received on other changes which were incorporated for the final rule. The changes to the burden table reflect those of the final rule and not those published in the NPRM.

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
Part 1301 – Program Governance			
1301.6(a) Establish written impasse procedures for resolving internal disputes	3,020	0.70	2,114
SUBTOTAL			2,114
Part 1302 – Program Operations			
Subpart A – ERSEA			
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
SUBTOTAL			196,224
Subpart C – Education and Child Development Program Services			
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
SUBTOTAL			1,643,984
Subpart D – Health Program Services			
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
SUBTOTAL			699,135
Subpart E – Family and Community Engagement Program Services			
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
SUBTOTAL			501
Subpart I – Human Resources Management			
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 periodic re-examination	26,503	0.25	6,626
1302.94(a) Regular volunteer screening for tuberculosis	3,020	0.166	501
SUBTOTAL			34,875
Subpart J – Program Management and Quality Improvement			
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
SUBTOTAL			239,680
Subpart 1303 – Financial and Administrative Requirements			
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	1.00	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	2.00	6,040
SUBTOTAL			332,661
Subpart 1304 – Federal Administrative Procedures			
1304.13: Agencies required to compete will have to complete an application for each grant competed.	75	60.00	4,500
1304.15(a): Each Head Start or Early Head Start agency wishing to be renewed for five years without competition shall request that status from ACF.	400	0.25	100
SUBTOTAL			4,600
TOTAL			3,153,774

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 \$97,451,617.

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 revisions to Section 1304 have changed the number of grantees projected to compete and therefore the burden under Section 1304 have been updated. As noted in section A8, the changes to burden related to these record-keeping activities and updated in A12 reflect those of the final rule and not those published in the NPRM.

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.