То:	Jordan Cohen Office of Information and Regulatory Affairs (OIRA) Office of Management and Budget (OMB)
From:	Jesse Escobar Office of Head Start (OHS) Administration for Children and Families (ACF)
Date:	September 29, 2020
Subject:	NonSubstantive Change Request – Head Start Grant Application (OMB #0970-0207)

This memo requests approval of nonsubstantive changes to an approved information collection: the Head Start Grant Application (OMB #0970-0207). These are COVID-19 related changes.

Background

The Head Start Grant Application collects information from all Head Start and Early Head Start grantees on the application for Head Start funding including program budgets and narratives. The information is collected on an annual basis when grantees apply for their annual funding and as needed for supplementary funding. OMB most recently extended this information collection with changes on April 29, 2019 (OMB #0970-0207). The information collection is currently approved until April 30, 2022.

The Coronavirus Aid, Relief, and Economic Security (CARES) Act, 2020 (P.L. 116-136), made available \$750 million for programs under the Head Start Act for activities in response to COVID-19. Typically, grantees would submit their budget plans under the Head Start Grant Application, however, grantees could not predict with certainty when and how programs could safely open or stay opened due to the fluidity of the COVID-19 pandemic. OHS recognized that grantees would need flexibility in their budget plans as they carefully planned and implemented the reopening of Head Start and Early Head Start programs while adhering to state and local guidance.

OHS has provided flexibility to grantees in responding to COVID-19 using CARES Act funding. To track updated budget plans in response to the pandemic, we are proposing nonsubstantive changes to the grant application to capture budget-related data on activities in response to COVID-19. These budget-related data would be captured once in the fall of 2020 and then once more towards the end of the program year, around Spring of 2021.

Overview of Proposed Changes

OHS is proposing nonsubstantive changes to the Head Start Grant Application to capture budgetrelated data on activities in response to COVID-19. These proposed changes are necessary to track updated program budget plans for activities funded by CARES Act as the existing grant application is not designed to accommodate the flexibility afforded with the funding approach of CARES Act funding.

ACF does not believe this will impact the burden estimate since the burden required to submit

budget plans is approved under the existing information collection. ACF will remove the proposed fields once they no longer needed for budget plans from CARES Act funding or any other supplementary funding in response to COVID-19.