

# **Recordkeeping for New Vaccine and Mask Requirements to Mitigate the Spread of COVID-19 in Head Start**

**OMB Information Collection Request  
0970 - NEW**

## **Supporting Statement Part A - Justification**

**December 2021**

Submitted By:  
Office of Head Start  
Administration for Children and Families  
U.S. Department of Health and Human Services

## **Summary**

ACF is requesting emergency review and approval of this information collection by OMB, as authorized under [44 U.S.C. 3507](#)(subsection j). The proposed recordkeeping is necessary to promote the safety of Head Start program staff, volunteers, and enrollees and mitigate the spread of COVID-19. The information collection is essential to the mission of the agency and to ensure Head Start programs are able to meet new vaccination requirements.

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

An Interim Final Rule with Comment Period (IFC) was published on November 30, 2021 that established the COVID-19 vaccination requirements whereby all Head Start staff (including some contractors) and volunteers working in classrooms or directly with children must be vaccinated by January 31, 2022 (86 FR 68052). The IFC also made, effective immediately upon publication, universal masking for all individuals two years of age and older. The recordkeeping only applies to the vaccination requirements of the IFC. All Head Start programs will need to 1) collect and maintain records on the vaccination status of staff and volunteers in Head Start and Early Head Start programs and 2) develop written COVID-19 protocol for testing individuals granted vaccine exemptions (this also includes the component for granting such exemptions). The burden associated with staff and volunteers to produce and provide such vaccination records are also considered in this information collection.

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

The recordkeeping requirement is for recipients of Head Start funding to collect and maintain the vaccination status of individuals impacted by the new vaccine requirements. The information will allow programs to identify needs and gaps in vaccination uptake of those individuals. Additionally, a written COVID-19 protocol for testing those granted vaccine exemptions promotes consistency and safety. The Office of Head Start may review those vaccine records and protocols for compliance purposes of requirements established by the IFC. However, no personally identifiable information will be collected and retained by the Office of Head Start through the monitoring review process.

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

There is no standard instrument required to be used to meet these recordkeeping requirements. This allows programs the most flexibility in maintaining vaccination status records. It is anticipated programs will use existing human resource systems and technology to maintain vaccination status in personnel files and establish protocols.

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

It is possible programs already have COVID-19 vaccination policies and testing protocols in place in their program. In those instances, this recordkeeping is not duplicative since those grant recipients can continue to use their existing recordkeeping processes in place. Not using a standardized instrument helps avoid duplication of existing recordkeeping efforts.

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

Not applicable.

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

The grant recipient will conduct a one-time information collection of vaccination records including requests for vaccination exemptions from all staff and volunteers which is necessary for the grant recipients to be able immediately assess which staff and volunteers are unvaccinated, to determine where support is needed, to respond to exemption request, and to implement testing protocols where needed. To implement COVID-19 safety protocols, it is first necessary for grant recipients to establish such protocols if they have not already done so. The one-time establishment of these protocols is necessary to ensure there are safety measures in place for staff and volunteers that are not vaccinated.

Ongoing information collections include obtaining vaccination records from new staff and new volunteers that enter the program (e.g., as a result of staff turnover). This ongoing information collection is necessary to ensure the vaccination records for staff and volunteers is complete for the program. Additionally, the updating of testing protocols to align with evolving health and safety guidelines related to COVID-19 will be an ongoing information collection. This is necessary to ensure those protocols remain relevant and responsive to the ongoing pandemic.

Without requiring Head Start grant recipients to keep a record of vaccination status for all staff and volunteers and written COVID-19 testing protocols, compliance with the new vaccine requirements could not be assured. Altogether, these record requirements will have significant benefits to promoting the health and safety of all individuals participating in the program including staff, children, and families involved.

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

There are no special circumstances for this information collection.

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

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing the agency's intention to request an expedited OMB review of this information collection activity. This notice alerted the public to a request for emergency approval for six months of data collection and provided a sixty-day comment period related to the full request that will be submitted to continue data collection beyond six months. OHS will review and consider all recordkeeping-related comments received in response to the IFR (86 FR 68052) and comments in response to the sixty- and thirty-day comment periods specific to these recordkeeping requirements. A full request to extend approval of this requirement will be submitted as soon as possible and will document any comments received and how ACF has considered the comments.

## **9. Explanation of Any Payment or Gift to Respondents**

Not applicable.

## **10. Assurance of Confidentiality Provided to Respondents**

Not applicable. No PII will be maintained by OHS as a result of reviewing grant recipient compliance with information collection and recordkeeping requirements associated with this IFC. Additionally, OHS may observe and review vaccination records without collecting or retaining any PII within any governmental system.

## **11. Justification for Sensitive Questions**

We acknowledge that the sharing of vaccination status can be sensitive to some people. Although the individual reporting of vaccination status will not be provided to the Office of Head Start, it is still required that the grant recipients collect it on behalf of the federal government in order to implement the vaccination requirements. The sensitive nature of collecting vaccination status is justified since it will result in substantial health benefits from reductions in COVID-19 mortality and morbidity. For additional information about those net benefits, please see the regulatory impact analysis section of the IFC.

## **12. Estimates of Annualized Burden Hours and Costs**

The one-time burden of staff and volunteers includes the 1) burden of staff and volunteers that have to become vaccinated and report it to the grant recipient which is estimated at about 2 burden hours per individual, 2) burden on staff and volunteers that are already vaccinated and need to find their vaccination card and show it to the grant recipient which is estimated at 5 minutes per staff, and 3) burden of staff and volunteers that want exemptions, need to

collect paperwork and show it to the grant recipient, who then needs to decide whether they qualify for an exemption which we estimate as a total burden of about 30 minutes per staff. The total burden hours for each of these circumstances are as follows (for additional information on the estimated number of staff and volunteers reported below, please see the regulatory impact analysis section of the IFC):

- 1) We estimate that about 58,116 additional staff and volunteers will become vaccinated and report it to their employer at 2 hours each for a total of 116,232 burden hours.
- 2) We estimate that about 78 percent of staff are already vaccinated and about 67 percent of volunteers are vaccinated. This means about 213,000 staff and about 711,000 volunteers are already vaccination and need to report this to the grant recipient for a total of 924,000 individuals at 5 minutes each for a total of 77,000 burden hours.
- 3) We anticipate that 5 percent of Head Start staff and volunteers will receive an exemption, or 13,650 staff and 53,050 volunteers. The exemptions at 30 minutes each will result in a total of 33,350 burden hours for those 66,700 staff and volunteers.

The ongoing burden for each recipient of Head Start funding to maintain complete records of vaccination status for all staff and volunteers is based on 20 percent of the 273,000 staff and 1,061,000 volunteers requiring updated vaccination records on an annual basis for a total of 266,800 staff and volunteers. The 20 percent is selected based on available program data on turnover rates. We estimate it would take about 1.5 minutes to collect and maintain each vaccination record within existing personnel and volunteer recordkeeping processes for a total of 6,670 hours or 4.2403 hours per recipient of Head Start funding on average.

The one-time burden for each recipient of Head Start funding to establish a written COVID-19 protocol for testing those individuals that are granted an exemption is estimated at 10 hours per program. The ongoing burden to keep it updated is estimated at 1 hour.

The following table displays the total burden for the information collection activities over three years. To annualize the burden hours and costs of the “one-time” activities, the average annual burden hours is divided by three for those activities.

Information Collection Title	Total Number of Respondents	Responses Per Respondent	Average Annual Burden Hours	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
Staff and Volunteer Reporting of New Vaccination (one-time)	58,116	1	0.6667	38,744	\$35.14	\$1,361,464
Staff and Volunteer Reporting of Existing Vaccination (one-time)	924,000	1	0.0278	25,666.7	\$35.14	\$901,927

Staff and Volunteer Requesting an Exemption (one-time)	66,700	1	0.1667	11,116.7	\$35.14	\$390,640
Grant Recipient Maintaining Complete Records of Vaccination Status (ongoing)	1,573	1	4.2403	6,670	\$49.56	\$330,565
Grant Recipient Establishing COVID-19 Testing Protocol (one-time)	1,573	1	3.3333	5,243.3	\$49.56	\$259,860
Grant Recipient Maintaining COVID-19 Testing Protocol (ongoing)	1,573	1	1	1,573	\$49.56	\$77,958
<b>Estimated Annual Burden Total:</b>				89,013.7	<b>Estimated Annual Cost Total:</b>	\$3,322,413

The total annualized cost for the recordkeeping requirement is estimated at \$3,322,413.

The burden on staff and volunteers vaccination record reporting is based on May 2020 wage data provided for preschool teachers by the U.S. Bureau of Labor Statistics at \$17.57 per hour (Source: <https://www.bls.gov/oes/current/oes252011.htm>) for staff and volunteers. To account for benefits and overhead the rate is multiplied by two which is \$35.14. Although volunteers are unpaid, the wage data is still applied to monetize their burden hours.

The burden on grant recipient record keeping requirements is based on May 2020 child care services wage data provided by the U.S. Bureau of Labor Statistics at \$24.78 per hour (Source: job code 11-9031, <https://www.bls.gov/oes/current/oes119031.htm>). To account for benefits and overhead the rate is multiplied by two which is \$49.56.

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

Not applicable. The grant recipients already have existing human resource systems to maintain files on staff and volunteers alongside other files such as background checks.

### 14. Annualized Cost to the Federal Government

There are no additional costs to the federal government. Any associated costs will be covered by existing costs for monitoring activities to review records maintained by programs.

### 15. Explanation for Program Changes or Adjustments

This is a new information collection.

**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**

Display of OMB expiration date will be included in the confidentiality statement provided to grant recipients which will provide information on confidentiality policies related to staff and volunteer vaccination records including an assurance that PII will not be maintained by OHS. There is no standardized instrument.

**18. Exceptions to Certification for Paperwork Reduction Act Submissions**

Not applicable.