

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

**OMB Information Collection Request
0970 – 0583**

Supporting Statement Part A - Justification

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

Summary

ACF requested 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 ensures Head Start programs are able to continue to meet vaccination requirements. This current request is to extend approval for an additional three years. There are no changes currently to the requirements, but ACF is currently finalizing the related Final Rule. If any changes to requirements result during this process, ACF will work with OMB to submit those changes for review and approval.

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, certain 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 in this request 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, contractors, 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, contractors, and volunteers to produce and provide such vaccination records are also considered in this information collection.

2. Purpose and Use of the Information Collection

Head Start grant recipients are required to collect and maintain the vaccination status of individuals in the program per the vaccine requirements under the IFC. This recordkeeping requirement allows programs to identify needs and gaps in vaccination uptake of those individuals. Additionally, the IFC requires a written COVID-19 protocol for testing those granted vaccine exemptions to promote consistency and safety in the implementation of such exemptions. 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 are no standard instruments 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 and management 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 had COVID-19 vaccination policies and testing protocols in place in their program prior to the IFC. In those instances, this recordkeeping is not duplicative since those grant recipients could continue to use or make adjustments to 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

Grant recipients will continue to collect vaccination records from current staff, contractors, and volunteers to and any new staff, contractors, and volunteers that enter the program on an ongoing basis. This information collection is necessary to ensure the vaccination records for staff, contractors, and volunteers is complete for the program. Additionally, grant recipients will continue to establish and update testing protocols to align with evolving health and safety guidelines related to COVID-19. 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 staff, contractors, and volunteers and maintain 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 (86 FR 71504). 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 reviewed and considered 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. Most of the comments were not specific to the Paperwork Reduction Act and those comments will be addressed in the related Final Rule being finalized by ACF. If there are any changes to requirements established by the IFC that result during this process, then ACF will work with OMB to submit for review and approval any changes to recordkeeping requirements necessary in this request. There were a few comments that raised concern about the general burden associated with the recordkeeping requirements and as such, we revisited the burden estimates and they have been updated in this request based on more recent data available on the number of staff, contractor, and volunteer records that need to be collected and maintained.

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 burden of collecting and maintaining staff, contractor and volunteer vaccination records includes the 1) burden of staff, contractors, and volunteers that have to become vaccinated and report it to the grant recipient which is estimated at about 40 minutes or .6667 hours per individual, 2) burden on staff, contractors, 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 or .0833 hours per individual, 3) burden of staff, contractors, 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 is estimated at 30 minutes or .5000 hours per individual, and 4) grant recipients to collect and maintain records of staff,

contractors, and volunteers on an ongoing basis which is estimated at 6.3573 hours per grant recipient (this assumes about 1.5 minutes per new record. The total burden hours for each of these circumstances are as outlined in the burden table below.

The burden for each grant recipient of Head Start funding to establish a written COVID-19 protocol for testing those individuals that are granted an exemption is estimated at 3.33 hours per program. The ongoing burden to keep it updated is estimated at 1 hour per grant recipient.

The following table displays the annual burden for the information collection 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, Contractor, and Volunteer Reporting of New Vaccination	75,000	1	0.6667	50,002.5	\$35.06	\$1,753,088
Staff, Contractor, and Volunteer Reporting of Existing Vaccination	320,000	1	0.0833	26,656	\$35.06	\$934,559
Staff, Contractor, and Volunteer Requesting and Processing Vaccination Exemption	5,000	1	0.5000	2,500	\$35.06	\$87,650
Grant Recipient Maintaining Vaccination Records	1,573	1	6.3573	10,000	\$51.74	\$517,400
Grant Recipient Establishing COVID-19 Testing Protocol	1,573	1	3.3333	5,243.3	\$51.74	\$271,288
Grant Recipient Maintaining COVID-19 Testing Protocol	1,573	1	1	1,573	\$51.74	\$81,387
Estimated Annual Burden Total:				95,974.8	Estimated Annual Cost Total:	\$3,645,372

The total annualized cost for the recordkeeping requirement is estimated at \$3,645,372.

The burden on staff, contractors, and volunteers vaccination record reporting is based on May 2021 wage data provided for preschool teachers by the U.S. Bureau of Labor Statistics at \$17.53 per hour (Source: <https://www.bls.gov/oes/current/oes252011.htm>) for staff, contractors, and volunteers. To account for benefits and overhead the rate is multiplied by two which is \$35.06. 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 2021 child care services wage data provided by the U.S. Bureau of Labor Statistics at \$25.87 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 \$51.74.

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, contractors, 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

Updates to burden estimates were made based on the assumption using more recent program data that the continuation of the requirements will require 400,000 new vaccination records, primarily due to volunteer transitions and staff turnover. This also results in an adjustment of 6.3573 hours per grant recipient to collect and maintain records of staff, contractors, and volunteers on an ongoing basis (this assumes about 1.5 minutes per individual record).

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, contractors, 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.