To: Jordan Cohen

Office of Information and Regulatory Affairs (OIRA)

Office of Management and Budget (OMB)

From: Alysia Blandon

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Date: June 24, 2022

Subject: NonSubstantive Change Request – Head Start Family and Child Experiences Survey

(FACES 2019) (OMB #0970-0151)

This memo requests approval of nonsubstantive changes to the approved information collection, Head Start Family and Child Experiences Survey (FACES 2019) (OMB #0970-0151).

Background

The Administration for Children and Families' FACES study periodically collects nationally representative information about Head Start programs, their staff, and the children and families they serve to inform program planning and technical assistance and enable research. A full request package specific to the spring 2022 data collection was approved on December 20, 2021. Two nonsubstantive changes were also approved: 1) describing the cancelation of classroom observations (February 14, 2022), and 2) describing updates to consent collection procedures in addition to instrument revisions based on OMB and OHS comments (March 25, 2022). Spring data collection began at the end of April 2022. Since data collection began, analysis of completed surveys shows that respondents are taking longer than the estimated time to complete for seven instruments, and shorter than the estimated time to complete for two instruments. Changes to the instruments triggered by low fall response rates (because of COVID) and a desire to include items related to the proposed Build Back Better Act were implemented very close to data collection. The survey length estimates were based on rough changes to item counts rather than pretesting which was not an option in the time available. The item count adjustments appear not to fully account for the cognitive burden of the new items. Because of the critical importance of the data being collected, we have not attempted to cut items from the instruments that are longer than anticipated.

Overview of Requested Changes

We are requesting to change the burden estimate for following nine instruments, to reflect a better estimate of average time to complete.

- FACES 2019 Head Start teacher survey-- returning respondents (Attachment 11; from 39 minutes to 50 minutes)
- FACES 2019 Head Start program director survey (Attachment 12; from 37 minutes to 59 minutes)
- FACES 2019 Head Start center director survey (Attachment 13; from 36 minutes to 51 minutes)

- AIAN FACES 2019 Head Start teacher survey—returning respondents (Attachment 20; from 39 minutes to 59 minutes)
- AIAN FACES 2019 Head Start teacher survey—new respondents (Attachment 20; from 41 minutes to 55 minutes)
- FACES 2019 special Head Start parent survey—returning respondents (Attachment 30; from 28 minutes to 31 minutes)
- FACES 2019 special Head Start teacher—child report (Attachment 31; from 10 minutes to 7 minutes)
- AIAN FACES 2019 special Head Start parent survey—returning respondents (Attachment 36; from 28 minutes to 31 minutes)
- AIAN FACES 2019 special Head Start teacher—child report (Attachment 37; from 10 minutes to 7 minutes)

In addition to the changes in burden for those instruments, we have also updated the burden table in the attached Supporting Statement Part A to reflect that our child sample sizes will not be as large as we had hoped. We have also updated Supporting Statement Part B to reflect the change in anticipated samples sizes and precision estimates. As a result, the total burden for the following instruments has been reduced:

- FACES 2019 special Head Start parent survey—new respondents (Attachment 30)
- FACES 2019 special Head Start teacher–child report (Attachment 31)
- AIAN FACES 2019 special Head Start parent survey—new respondents (Attachment 36)
- AIAN FACES 2019 special Head Start teacher—child report (Attachment 37)

Time Sensitivities

We anticipate we will exceed the approved burden for the included instruments starting by early July 2022.