

Recordkeeping to Mitigate the Spread of COVID-19 in Head Start

**OMB Information Collection Request
0970 – 0583**

Supporting Statement Part A - Justification

June 2023

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

Summary

The Administration for Children and Families (ACF) published an Interim Final Rule with comment (IFC) to establish new program standards, including recordkeeping requirements, to mitigate the spread of the coronavirus disease 2019 (COVID-19) in Head Start programs. ACF requested from Office of Management and Budget (OMB) emergency review and approval of the information collection requirements, as authorized under [44 U.S.C. 3507](#) (subsection j), which allowed for 6 months of approval under the Paperwork Reduction Act (PRA). This was followed by a full request, including two public comment periods, to extend approval of the recordkeeping requirements without changes. The OMB Control Number 0970-0583 for this information collection request (ICR) was established as a result.

ACF issued two Final Rules following the IFC – one on January 6, 2023, and one on June 26 2023.

- The final rule issued on January 6, 2023, added a new recordkeeping requirement that programs update their program policies and procedures to include an evidence-based COVID-19 mitigation policy to continue to promote the safety of Head Start program staff, volunteers, and enrollees and mitigate the spread of COVID-19. ACF requested another emergency review and received approval for the new recordkeeping requirement by OMB as authorized under 44 U.S.C. 3507 (subsection j). This was necessary to ensure programs were able to meet the requirements by the effective date of the final rule, 60 days following publication.
- The final rule published on June 26, 2023, removed all previously established vaccination recordkeeping requirements and the requirement on maintaining a testing protocol. The only remaining recordkeeping requirement was the one established in the final rule issued on January 6, 2023.

This information collection only contains the remaining recordkeeping requirement that is currently applicable to Head Start programs following the IFCs and Final Rules described above. This remaining recordkeeping requirement is essential to the mission of the agency to promote the safety of Head Start program participants.

1. Circumstances Making the Collection of Information Necessary

Head Start grant recipients are required to update their program policies and procedures to include an evidence-based COVID-19 mitigation policy developed in consultation with their Health Services Advisory Committee (HSAC). This recordkeeping requirement is the only one that remains. All the other previously approved recordkeeping activities related to vaccinations and the testing protocol under this information collection have been removed.

2. Purpose and Use of the Information Collection

The recordkeeping requirement that grant recipients update program policies and procedures to include an evidence-based COVID-19 mitigation policy promotes organization-wide approaches to mitigating the spread of COVID-19. This recordkeeping requirement will promote the health and safety of all individuals participating in the program including staff,

children, and families involved. The Office of Head Start (OHS) may review the documented program policies and procedures for compliance purposes with the Final Rules.

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 documenting their evidence-based COVID-19 mitigation policy as part of their existing program policies and procedures.

4. Efforts to Identify Duplication and Use of Similar Information

It is expected that programs already had policies related to COVID-19 mitigation prior to the most recent Final Rule and upon submission of this request. This recordkeeping is not duplicative since grant recipients can continue to update those existing policies by working with their HSAC, as needed. We estimate that only a small number of programs will need to update their COVID-19 mitigation policies on an ongoing basis.

5. Impact on Small Businesses or Other Small Entities

Not applicable.

6. Consequences of Collecting the Information Less Frequently

This information collection is necessary to ensure Head Start grant recipients establish and maintain an evidence-based COVID-19 mitigation policy. The information collection is not submitted to the OHS, but instead grant recipients are required to conduct the information collection and maintain it as part of their records. OHS may review those records for compliance purposes through the OHS Monitoring System. Without requiring grant recipients to record their policies in their program policies and procedures, it would be unclear their established organizational approach to mitigating the spread of COVID-19. This recordkeeping requirement will promote 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

ACF published a notice in the Federal Register on January 12, 2023 (88 FR 2101). This notice alerted the public of a request to expedite review from OMB for the new recordkeeping requirement in the final rule published January 6, 2023 (the expedited review was submitted and approved until August 31, 2023). The Federal Register notice also invited public comments on the revisions to the recordkeeping requirements under this information collection approval beyond the expedited review and approval process.

OHS had one request for a copy of the information collection associated with the new recordkeeping requirement, but there is no standard form. No other comments were received that were specific to the PRA.

9. Explanation of Any Payment or Gift to Respondents

Not applicable.

10. Assurance of Confidentiality Provided to Respondents

Not applicable. No personally identifiable information will be collected or maintained by OHS as a result of this recordkeeping requirement.

11. Justification for Sensitive Questions

Not applicable.

12. Estimates of Annualized Burden Hours and Costs

Programs are required to update their program policies and procedures to include their COVID-19 mitigation policy. Based on the experience with the more robust requirements previously approved under this OMB number and since nearly all programs already have these policies in place, and only need to keep them updated as needed once established, the average estimated annual burden for this recordkeeping requirement is about 2 hours for 10 percent of grant recipients.

Information Collection Title	Total Number of Respondents	Responses Per Respondent	Average Annual Burden Hours	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
Grant Recipient Updating Program Policies and Procedures	160	1	2	320	\$55.40	\$17,728
Estimated Annual Burden Total:				320	Estimated Annual Cost Total:	\$17,728

The total annualized cost for the recordkeeping requirement is estimated at \$17,728.

The cost to grant recipients is based on wage data from May 2022 on Education and Child Care Administrators in Preschool and Daycare provided by the U.S. Bureau of Labor Statistics at \$27.70 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 \$55.40.

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

Not applicable.

14. Annualized Cost to the Federal Government

Costs to the federal government for this recordkeeping activity are not substantive since the information collected is not submitted directly to the OHS. Instead grant recipients are required to conduct the information collection and maintain it as part of their records. OHS may review for compliance purposes through the OHS Monitoring System. If the OHS Monitoring System is used to review grant recipient records containing the required recordkeeping, then we project a total cost of \$25,760 assuming a portion of a monitoring reviewers time would be spent to review such records during a monitoring visit across a subset of grant recipients each year.

15. Explanation for Program Changes or Adjustments

Updates to burden estimates were made based on the revised recordkeeping requirements following the two final rules issued in 2023.

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

There is no standardized instrument.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

Not applicable.