

Head Start Program Performance Standards

**OMB Information Collection Request
0970 - 0148**

Supporting Statement Part A - Justification

August 2024

Type of Request: Revision

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

1. Circumstances Making the Collection of Information Necessary

Section 641A of the Head Start Act, 42 U.S.C. 9836A, directs the U.S. Department of Health and Human Services (HHS) to develop “scientifically based and developmentally appropriate education performance standards related to school readiness” and “ensure that any such revisions in the standards do not result in the elimination of or any reduction in quality, scope, or types of health, educational, parental involvement, nutritional, social, or other services.” The Head Start Program Performance Standards (HSPPS) set forth the requirements local Head Start grant recipients must meet in the delivery of Head Start program services. This information collection accounts for the record keeping activities and burden that is required per the HSPPS.

This submission is requesting a three-year extension with changes for the HSPPS record keeping activities (*OMB #0970-0148*). On August 21st, 2024, the Office of Head Start (OHS) published a final rule Supporting the Head Start Workforce and Consistent Quality Programming at <https://www.federalregister.gov/documents/2024/08/21/2024-18279/supporting-the-head-start-workforce-and-consistent-quality-programming> (89 FR 67720). Changes have been made to recordkeeping requirements, as described in this final rule.

2. Purpose and Use of the Information Collection

The goal of the HSPPS is to ensure that all children and families enrolled in Head Start are offered high quality services that are responsive to their needs as congressionally mandated. The information collection requirements are designed to support this goal.

These records are intended to act as a tool for grant recipients and delegate agencies to be used in their day-to-day operations. For example, this includes the requirement that programs maintain a waiting list of eligible families. The recordkeeping requirements are not collected through standard instruments to ensure grant recipients have the flexibility to determine how they can best approach such recordkeeping requirements. OHS provides training and technical assistance (TTA) to grant recipients to support them in meeting Head Start requirements including those associated with recordkeeping, but this does not involve standardized instruments collected by OHS. Instead OHS provides resources grant recipients can choose to use within their organizations through TTA and these are made available on the Head Start website at <https://eclkc.ohs.acf.hhs.gov/>. The information collections (i.e., recordkeeping) under this request support and improve the day-to-day operation and management of their programs. Federal staff or federal contractors in their role as program monitors and oversight may collect and review required recordkeeping documentation to assure compliance during monitoring events and to inform the provision of TTA.

3. Use of Improved Information Technology and Reduction Burden

OHS encourages grant recipients to acquire electronic recordkeeping systems and allows for the expenditure of grant funds to meet the acquisition costs of systems and technology that reduce burden and streamline processes associated with recordkeeping requirements.

4. Efforts to Identify Duplication and Use of Similar Information

In complying with these recordkeeping requirements, agencies are directed to use and build upon existing information, whenever it exists. It is the intent of these requirements that duplicity of efforts be avoided, and that information collection occurs only when information is not available from another source.

5. Impacts on Small Businesses or Other Small Entities

Not applicable.

6. Consequences of Collecting the Information Less Frequently

The HSPPS provide a regulatory structure for the monitoring and enforcement of these standards for all Head Start programs operated by grant recipients. Without appropriate collection of the information required by the standards, a comprehensive assessment of quality services and consequently compliance with regulations could not be assured.

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

Not applicable.

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 OMB review of this information collection activity. This notice was published on 05/16/2024 (89 FR 42884) and provided a sixty-day period for public comment. During the notice and comment period no comments were received specific to the Paperwork Reduction Act.

9. Explanation of Any Payment or Gift to Respondents

Not applicable.

10. Assurance of Confidentiality Provided to Respondents

Not applicable.

11. Justification for Sensitive Questions

Not applicable.

12. Estimates of Annualized Burden Hours and Costs

Depending on the standard, the calculated burden hours is based on the estimated number of enrollees (800,000), family (723,000), grant (1,900), program (2,900), or staff (248,000). Depending on the application of the recordkeeping activity, the annual burden of the activity may only apply to a proportion of one of these groups. Burden estimates

are calculated based on the current estimated number of respondents and experience to date with the time to complete activities on an annual basis.

Recordkeeping Standard	Annual Number of Respondents	Average Burden Hours per Response	Annual Burden Hours
Part 1301 – Program Governance			
Maintain written impasse procedures for resolving internal disputes	2,900	0.7	2,030
Part 1302 – Program Operations			
Subpart A – ERSEA			
Documenting eligibility	260,000	0.25	65,000
Maintain a waiting list	2,900	2	5,800
Track attendance	2,900	5	14,500
Written plan to support program participation following temporary suspension	150	1	150
Subpart C – Education and Child Development Program Services			
Obtain child developmental screenings and conduct standardized and structured assessment for individualizations	800,000	1	800,000
Dual Language Learners Assessment	269,000	2	538,000
Subpart D – Health Program Services			
Obtain determinations of child health status, source of health care, and identify each child’s nutritional health needs	800,000	0.66	528,000
Documents lack of available funds for assessment and treatment	2,900	0.5	1,450
Maintaining records on the administration of medication	2,900	0.5	1,450
Maintenance of plan to prevent exposure to lead in water and paint	1,900	0.5	950
Subpart E – Family and Community Engagement Program Services			
Waiver to family service worker assignment ratios	190	1	190
Joint agreements, procedures, or contracts with community organizations and memorandum of understanding with the appropriate local entity responsible for managing publicly funded preschool programs in the service area of the program	2,900	0.166	481
Subpart H - Services to Enrolled Pregnant Women			
Documenting services to enrolled pregnant women	13,000	0.5	6,500
Subpart I – Human Resources Management			
Tracking wages for Head Start staff and staff in local school districts	2,900	5	14,500
Criminal record checks	74,000	0.33	24,420
Ensure all staff has an initial health examination and periodic re-examination	25,000	0.25	6,250
Regular volunteer screening for tuberculosis	2,900	0.166	481
Subpart J – Program Management and Quality Improvement			
Maintain automated accounting and recordkeeping system and collect and use data to monitor program performance and continuous improvement, and conduct a self-assessment and community assessment	2,900	79	229,100
If deficient, EHS or HS program submits Quality Improvement Plan	100	10	1,000
Reporting child incidents	131	0.083	11
Subpart 1303 – Financial and Administrative Requirements			
Submit proof of coverage	2,900	0.166	481
Parental Consent, Annual Notice, and Recordkeeping of PII Disclosure	723,000	0.33	238,590
Applications for the purchase, construction or renovation of facilities; record retention and submission of documents on facilities	250	40	10,000
Waiver request	200	1	200
Up-to-date child rosters and lists of adults each child is authorized to be released to are maintained.	2,900	2	5,800
Subpart 1304 – Federal Administrative Procedures			
Agencies required to compete will have to complete an application for each grant competed.	75	60	4,500
Each Head Start or Early Head Start agency wishing to be renewed for five	400	0.25	100

years without competition shall request that status from ACF.			
Record Keeping of Program Policies and Procedures			
Updating program and personnel policies and procedures that promote implementation of Head Start standards in the program ¹	2,900	9	26,100
TOTAL			2,526,034

To calculate the cost specific to the recordkeeping requirements for this item of the OMB Clearance Package, we reference job code 39-9011 Childcare Workers in the Occupational Employment and Wages, May 2023. We specifically use the hourly mean wage for child care workers in the Elementary and Secondary Schools industry because the HSPPS require qualifications that would demand higher wages that would better align to child care in elementary and secondary schools when compared to other child care settings.

The average hourly wage is \$17.12 according to this source. To account for fringe benefits and overhead the rate is multiplied by two which is \$34.24. We multiply the total number of burden hours by this wage to estimate an annualized burden cost of \$86,491,404.

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

No other annual costs.

14. Annualized Costs to the Federal Government

The estimated annual cost to the federal government is \$1,000,000. This estimate is based on 400-800 monitoring visits per year where 20-40 hours are spent by monitoring reviewers to review the records maintained by the Head Start grant recipient. Additionally, the number of respondents and responses have been updated to reflect the current number of programs.

15. Explanation for Program Changes or Adjustments

On August 21st, 2024, OHS published a final rule Supporting the Head Start Workforce and Consistent Quality Programming (89 FR 67720). Changes have been made to recordkeeping requirements, as described in this final rule and burden estimates have been adjusted as a result. Additionally, the number of respondents and responses have been updated to reflect more current program data.

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

¹ Although not explicitly required by any standard, nearly all programs have developed program policy and procedure document(s) as part of implementing the HSPPS. For example, programs maintain and update their program policies and procedures to implement their COVID-19 mitigation policy, disaster and preparedness plans, safety procedures, and ERSEA manuals. This also includes updates to policies and procedures documents specific to personnel.

OMB expiration date should not be displayed since there is no single standard form related to this OMB Clearance Package.

18. Exceptions to Certification for Paperwork Reduction Act Submission.

Not applicable.