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Office of Information and Regulatory Affairs (OIRA)
Office of Management and Budget (OMB)

From: Jesse Escobar
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Administration for Children and Families (ACF)

Date: January 15, 2025

Subject: NonSubstantive Change Request – Program Information Report (OMB #0970-0427)

This memo requests approval of nonsubstantive changes to the approved information collection, Program Information Report (OMB #0970-0427).

Background

Since the inception of the Program Information Report (PIR) in 1978, the PIR continues to be the principal source of basic information about the operating characteristics of Head Start programs and the services they provide. The PIR is used by various audiences including federal and state officials, researchers, early childhood national and state associations, technical assistance providers, and local early childhood programs.

The Office of Head Start (OHS) periodically makes updates to the PIR, typically, with the following goals:

- Continue to collect key and relevant data about children and their families served, staff employed, and services offered by Head Start programs;
- Align with Head Start policy;
- Promote integrity and quality of program data; and
- Consider and balance the burden and benefits of the data collection.

The current PIR (OMB #0970-0427) is approved by OMB through June 30, 2025 and an extension request will go out for public comment in the upcoming months. In the meantime, OHS has identified minor changes to the PIR that are intended to improve the information collection and do not impact the current burden estimates.

Overview of Requested Changes

The following are proposed non-substantive changes to the currently approved version of the PIR:

- We currently collect race and ethnicity in the annual Head Start PIR. We are making revisions to align with SPD-15 recommendations which are described as follows with justification:
    1. **Only collecting minimum reporting categories, not detailed categories.** OHS proposes only displaying the detailed reporting categories as examples without collecting detailed category data itself, to reduce burden on programs in collecting

race/ethnicity information. OHS data system representatives expressed concern that collecting the detailed categories would impose a substantial burden on Head Start programs.

2. **Added "multiracial and/or multiethnic" category for aggregate reporting purposes.** This information collection is designed to be collected at the aggregate program level; we do not collect this data at the individual level. Because OHS does not receive individual-level data on race/ethnicity through the PIR, the "multiracial and/or multiethnic" option has been added to allow for reporting on individuals with more than one race/ethnicity. This avoids issues with duplicate counts in the data which will greatly benefit reports on race/ethnicity of enrollees and staff in the program. To promote alignment with SPD-15, we expect programs to allow families and staff to select multiple races and/or ethnicities and then reassign them to this category. This expectation is also further promoted through the third revision.
3. **Added subsequent question to collect race/ethnicity data for those who identify as more than one race/ethnicity.** To promote programs collecting data on the race/ethnicity identities of those who identify as more than one race/ethnicity while also better understanding the race/ethnicity of multiracial/multiethnic families and staff in programs, we added a subsequent question where programs will report the detailed multi-selected categories for those who are reported in the "multiracial and/or multiethnic" category of the preceding race/ethnicity question.

- Two reporting categories are added to PIR question A.13 to align with the updated standards, which allow for new eligibility options for Migrant Seasonal Head Start and tribal Head Start programs in 45 CFR 1302.12(e) and 45 CFR 1302.12(f).
- We propose adding a question, A.15, as an extension of question A.13, in order to understand the number of children/pregnant women whose income was adjusted for excessive housing costs to determine eligibility in A.13.a and A.13.f. Although this is a new question, it is an extension of question A.13 that aligns with the excessive housing cost adjustment outlined in 45 CFR 1302.12(i)(1)(ii). This change is to better understand the extent to which programs are adjusting for excessive housing costs when determining income eligibility.
- The CDC blood lead reference value has been updated for 2022 and the PIR Question C.9 has been updated to align with the updates.
- Instructions preceding questions C.24 and C.25 in the PIR on eligibility under the IDEA have been updated for clarity to remove unnecessary details. There are no intended changes to how the data was previously collected.
- The drop-down selection options in questions C.29, C.30, C.31.a, C.31.b., and C.31.c on curricula and assessment tools have been updated to add new options that align with updates to the field and with the curricula listed on the ECLCK site: https://eclkc.ohs.acf.hhs.gov/curriculum/consumer-report.
- Additional minor changes for plain language and clarification purposes (e.g., replacing "baccalaureate" degree with "bachelor's" degree), as well as terminology updates (e.g., Head Start Preschool).

Time Sensitivities

These updates are proposed for incorporation prior to the 2025-2026 program year. Timely approval is requested to release the final advanced copy of the PIR before Spring.